

Nordland, WA 98358

I have been hearing the Growler here on the east side of Marrowstone Island, even with all windows closed. I understand there is a need for training but the EIS to expand over wilderness and rural areas seems highly flawed by using an average sound level when the peak audio level that is damaging and disturbing follows the planes everywhere they fly. The huge increase in flying days will result in a major decrease in property values and health issues related to a lack of sleep and angry frustration. I strongly demand that the Navy more efficiently use existing flying routes and not add to the audible noise and electromagnetic noise floor in presently pristine areas that will be damaged by this unnecessary and expensive training area expansion.

1.a. Thank You  
12.j. Property Values  
19.d. Electronic Warfare  
2.k. Range of Alternatives  
3.a. Aircraft Operations  
4.l. Points of Interest  
4.m. Supplemental Metrics  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

1.a. Thank You

Victoria, British Columbia V8S1T3

I am 78 years of age with hearing loss but I can still hear the growlers from my bedroom with windows closed and whidbey island is over 30 miles away. I understand the need for the growler aircraft and appreciate all efforts to,reduce the noise but it really is quite loud and also you can feel the vibrations too!

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## QUIET SKIES

Over San Juan County

### Navy DRAFT Environmental Impact Statement (EIS)

To add 36 Growlers to the 82 already based at  
Naval Air Station Whidbey Island (NASWI)

#### Meeting with the NAVY

Lopez Center for Community and the Arts  
Wednesday, December 7, 2016  
Drop in: 3 - 6 pm

#### To view the Draft EIS:

Hard Copy at the Lopez Library  
Online: [http://www.whidbeyeis.com/  
CurrentEISDocuments.aspx](http://www.whidbeyeis.com/CurrentEISDocuments.aspx)

#### What is this meeting about?

At the Scoping Meeting in 2014, the Navy asked for comments on what we wanted them to consider – before adding 36 Growlers to NASWI. They have supposedly done that and the Draft EIS (1,500 pages) presents the results of what they considered and their reasons for not incorporating certain public suggestions.

The Draft EIS presents 3 Action Alternatives – all of which include adding an additional 35 or 36 Growlers to NASWI.

**The meeting will be an opportunity to ask questions of the Navy personnel which may help clarify your concerns and help us create useful comments to submit.**

#### Our job NOW is to read the Draft EIS and find:

- \* Errors or new information that would change the analysis and conclusions.
- \* Things that are incorrect, incomplete or need to be clarified.
- \* A substantially different Alternative that meets the Navy purpose and need.

#### We need to comment by January 25, 2017:

This is a time to say more than "I'm opposed to adding 36 more Growlers." We have to say specifically where the Navy analysis is incorrect or incomplete. Comments need to be supported by Draft EIS page number, explanations, facts and references. **In Federal procedures only individuals who have commented can object when the Decision is made.**

Suggested comments begin on the next page. Feel free to edit or use your own words.

**Page 5 is a summary of the comments. You can fill in your name and address and drop the sheet into the comment box at the December 7th meeting.**

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.m. Supplemental Metrics
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

## Suggested Comments on the Navy Draft EIS

### 1. Not evaluating the low-frequency noise characteristics of the Growler

Section 3.2 - Noise Associated with Aircraft Operations - makes no mention of the signature low-frequency noise of the Growler. All of the noise analysis is solely based on A-weighted sound (dBA) which ignores the lower frequencies, and is therefore deficient.

Nevertheless, the Draft EIS at 4-194 states "... the 2012 study included a brief examination of low-frequency noise associated with Growler overflights at 1,000 feet AGL in takeoff, cruise, and approach configuration/power conditions ... The study found that takeoff condition ... overall C-weighted sound level of 115 dBC. The Growler would exhibit C-weighted sound levels up to 101 dBC when cruising and 109 dBC (gear down) at approach." Page 4-193 states "According to Hubbard (1982), a person inside a structure can sense noise through vibration of the primary components of a building, such as the floors, walls, and windows; by the rattling of objects; ..."

The World Health Organization "Guidelines on Community Noise" (Berglund, 1999) <http://apps.who.int/iris/bitstream/10665/66217/1/a68672.pdf> states:

"When prominent low frequency components are present, noise measures based on A-weighting are inappropriate;"  
 "Since A-weighting underestimates the sound pressure level of noise with low frequency components, a better assessment of health effects would be to use C-weighting"

Closing windows and doors provides limited reduction for low frequency noise entering a building as measured by sound Transmission Loss tests (see graph on <http://windowanddoor.com/article/04-april-2007/understanding-basics-sound-control>). Therefore assumptions throughout the study assuming an average noise level reduction with windows closed is optimistic.

**RECOMMENDATION: Evaluate impacts of the Growler at low frequencies (C-weighted, dBC).**

### 2. Discounting Health Effects of Noise

The Draft EIS at 3-22 states "No studies have shown a definitive causal and significant relationship between aircraft noise and health. Inconsistent results from studies examining noise exposure and cardiovascular health have led the World Health Organization (2000) to conclude that there was only a weak association between long- term noise exposure and hypertension and cardiovascular effects."

The statement above disagrees with multiple findings in the WHO "Guidelines on Community Noise" (Berglund, 1999):

"For a good night's sleep, the equivalent sound level should not exceed 30 dB(A) for continuous background noise, and individual noise events exceeding 45 dB(A) should be avoided."

"For noise with a large proportion of low frequency sounds a still lower guideline is recommended"

"It should be noted that a large proportion of low frequency components in a noise may increase considerably the adverse effects on health"

"The evidence on low frequency noise is sufficiently strong to warrant immediate concern"

Waye (2004) finds "As low frequencies propagate with little attenuation through walls and windows, many people may be exposed to low frequency noise in their dwellings. Sleep disturbance, especially with regard to time to fall asleep and tiredness in the morning, are commonly reported in case studies on low frequency noise. However, the number of studies where sleep disturbance is investigated in relation to the low frequencies in the noise is limited. Based on findings from available epidemiological and experimental studies, the review gives indications that sleep disturbance due to low frequency noise warrants further concern." <http://www.noiseandhealth.org/text.asp?2004/6/23/87/31661>

Specific guidelines are found in the "WHO Night Noise Guidelines for Europe" (2005), Table 5.1, "Summary of effects and threshold levels for effects where sufficient evidence is available." [http://www.euro.who.int/\\_data/assets/pdf\\_file/0017/43316/E92845.pdf](http://www.euro.who.int/_data/assets/pdf_file/0017/43316/E92845.pdf)

During Scoping 1785 comments were submitted on Noise and Vibration and 914 on Health Effects (Table 1.9-5).

**The Navy has not demonstrated there are no health impacts from Growler noise.**

**RECOMMENDATION: Recognize the impacts of low frequency Growler noise on health.**

### **3. Exclusion of San Juan County Noise Reports**

Section 1.9.5 states "The Navy continues to evaluate noise reports that have been developed by independent sources and review their findings in conjunction with this EIS analysis." Not included in the Draft EIS is data collected by San Juan County (SJC) <http://sjcgis.org/aircraft-noise-reporting/> Data collected since May 14, 2014 has been regularly sent to NASWI.

More than 6000 citizen reports include date, time, location and noise characteristics. The Navy should correlate that data with the information they collect on flight tracks to understand what activity causes disruptive noise in SJC. Actual noise reports and measurements should be used to benchmark the computer modeled noise impacts used for evaluation and decision-making. Reports can also help to develop mitigation measures.

**RECOMMENDATION: Incorporate San Juan County noise reports in the EIS analysis.**

### **4. Exclusion of the SJI National Monument**

The Draft EIS suggests that the lands and waters of the San Juan Islands National Monument are exempt from National Environmental Policy Act protection because the 2013 proclamation establishing the Monument states: "Nothing in this proclamation shall be deemed to restrict safe and efficient aircraft operations, including activities and exercises of the Armed Forces in the vicinity of the monument."

Legally, this only has the effect of preserving the status quo: it clarifies that the creation of the National Monument does not place any additional burden on the Navy to justify its operations in the vicinity. The President did not--indeed, he did not have the power to exempt the Monument area from federal laws that already applied to wildlife there. Hence creation of the Monument did not exempt the Navy from NEPA or Endangered Species Act with respect to wildlife in the Monument, such as Marbled Murrelets or marine mammals.

At 3.5.2.4 the Draft EIS acknowledges "However, the Bureau of Land Management (BLM) has determined that BLM-owned and controlled lands in the San Juan Islands National Monument possess wilderness characteristics." It also concedes that the Monument is subjected to a maximum noise level of 95 dB (SEL) an estimated 372 times per year (at 3-34)

**RECOMMENDATION: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

##### 5. Exclusion of New Technology Alternatives

In 2014 the Department of Defense successfully demonstrated carrier takeoff, landing, and formation flying capabilities of the unmanned X-47B prototype that is part of the Unmanned Carrier-Launched Airborne Surveillance and Strike (UCLASS) program. <http://breakingdefense.com/2014/08/x-47b-drone-manned-f-18-take-off-land-together-in-historic-test>  
The UCLASS jets can meet the Purpose and Need, delivering the same capability for electronic surveillance and attack against enemy radar and communications systems as the Growlers.

This Alternative has many benefits. Because of its inherent automation UCLASS would significantly reduce the amount of land-based training that impacts our community. It eliminates the high risk to the Growler's two-person crew from advanced anti-aircraft threats. The smaller UCLASS vehicle is lighter and uses less fuel. Eliminating the \$3 billion purchase of 36 Growlers will save taxpayer money. Some experts believe we are already flying the last generation of manned military aircraft. With a focused effort the Navy could deploy the UCLASS while the existing 82 Growlers carry out the mission.

**RECOMMENDATION: Evaluate a new Alternative that deploys UCLASS jets instead of more Growlers.**

##### 6. Lack of Commitment to Noise Mitigation

At 1-20 the Draft EIS discusses Noise Mitigation. The only cited measure in place is "to share flight schedules and other information and to solicit public feedback." Potential measures include construction and operation of a noise suppression facility for engine maintenance (Hush House), Engine Chevrons (noise reduction) and MAGIC CARPET (automating parts of carrier landing which will reduce FCLP training activity).

Further discussion on Existing Mitigation at 3-30 states "NAS Whidbey Island has noise-abatement procedures ... to minimize aircraft noise. Airfield procedures used to minimize/abate noise ... include optimizing of flight tracks, restricting maintenance run-up hours, runway optimization, and other procedures .... Additionally, aircrews are directed, to the maximum extent practicable, to employ prudent airmanship techniques to reduce aircraft noise impacts and to avoid sensitive areas except when operational safety dictates otherwise."

Each Alternative is an irrevocable decision to add 35 or 36 Growlers at NASWI. Therefore the Navy should commit to Mitigation measures as part of the Final EIS and Record of Decision. Since experts have identified the need for additional research on health effects of low frequency noise the Navy should sponsor this research.

**RECOMMENDATION: Commit to Mitigation Measures with timelines in the Record of Decision.**

**Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex**

**Open House Comments**

Fill in and Submit at the  
Open House

- 1. Name [REDACTED] \_\_\_\_\_
- 2. Organization/Affiliation \_\_\_\_\_
- 3. Address [REDACTED] \_\_\_\_\_
- 4. E-mail [REDACTED] \_\_\_\_\_
- 5. Please check here  if you would NOT like to be on the mailing list
- 6. Please check here  if you would like your name/address kept private
- 7. Please check here  if you would like to receive a CD of the Final EIS

**Comments**

*Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)*

- 1. Evaluate impacts of the Growler at low frequencies (C-weighted, dBC).
- 2. Recognize the impacts of low frequency Growler noise on health.
- 3. Incorporate San Juan County noise reports in the EIS analysis.
- 4. Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.
- 5. Evaluate a new Alternative that deploys UCLASS jets instead of more Growlers.
- 6. Commit to Mitigation Measures and timelines in the Record of Decision.
- 7. Add your own comments here:

*I find the current noise very disturbing but have tolerated it assuming it would not get worse. Adding more planes mean intolerable*

(Continue on the back)



noise. I am especially concerned about the amount of noise over Lopez School. As a retired teacher & speech language pathologist, I am familiar with the difficulty in maintaining student attention. The problem is not just one of whether the teacher's voice can be heard. That is certainly important, but does not take into account many other factors related to the student's ability to maintain attention over a long enough time span to have clear understanding of the topic of the day. Continuous disruption would for many students would mean no learning at all!

Langley, WA 98260

1.a. Thank You  
4.o. Classroom Learning Interference

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states, "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and reanalyzed.

102 Second Street, ME 04347

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 2.k. Range of Alternatives

To Whom it May Concern: As someone who has worked at [REDACTED] for several years, I have first-hand experience of what it is like to be under the Growlers where they accelerate out of their turns when practicing at the OLF. As a farmer, I work outside directly under these conditions. In my experience over the past few years, flights are clustered in the spring and summer, often during work hours when we must be out in the fields working. We have no escape. I and my co-workers would wear two sets of ear protection, and even then it was difficult to work under the jets. We could not communicate with each other. There were times when we were forced to end the work day before we were finished because of the jet noise. It is unnerving to literally feel the sound vibrations from the jets passing overhead in my chest and stomach. Psychologically, when you saw and heard the first jet coming, the dread and immediate response to protect yourself is exhausting, especially on the fifth day in a row of flights during a long work week. To know that the Navy has very real intentions to increase the number of flights at OLF and at the scale proposed terrifies me, as it will not be possible to farm under those conditions. No one argues that the Navy has not used this flight path for decades. However, Coupeville has been an agricultural community for much longer than that. What we are concerned about are the jets being used on this flight path. My understanding from locals and those who settled near the flight paths well before the Growlers were brought in is that the noise from jets previously used was absolutely tolerable to work and live under. Aside from the noise pollution from the Growlers and health concerns related to it, it also terrifies me that the chemicals used by the Navy in fire-fighting at crash sites is being found in well water, and the Navy does not seem to be doing anything to mitigate the risk of contamination. If any of the farms find that their wells are contaminated, they are finished as a business. This is NOT acceptable for Coupeville. If the OLF sees an increase in flights, inevitably there will be an increased risk of contamination (or further contamination), and this is heartbreaking. For all the Navy stands for, I cannot reconcile how an organization whose purpose is to protect its citizens can continue to put those same citizens at risk in such ways. I do not hate the Navy. I do not hate those who serve our country. I discovered quickly when I moved to the Coupeville area that it was difficult if not impossible to have a conversation with someone on this topic if you did not agree, as each side painted the other with a broad brush. I understand that the Navy is a livelihood for many and an economic boon for some sectors in the area. In fact, I find certain aspects of seeing people practicing quite exciting and impressive. I do have a hard time believing that there is not an alternative jet (and one where the landing gear is retracted during practice flights) that can be used in areas of such close proximity to civilian communities and work spaces, because it has been the case in the past. Thank you for your time. I have read a number of other comments from citizens who have additional concerns and are better educated on the risks of the jets on our health, environment, economy and community. I agree with many of their points but will stick to my personal experiences (though [REDACTED] expresses my concerns very well). I hope that our concerns are not taken lightly. Coupeville is a fantastic place to live and farm and it would be tragic for the town's agricultural heritage and economy to come to an end because of choices made by the Navy. There are ways

for the Navy to continue to train its sailors on Whidbey in a way that is not detrimental to the health of its citizens and ecosystem. Thank you, [REDACTED]

Freeland, WA 98249

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.g. Average Annual Day/Average Busy Day Noise Levels

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance

Mercer Island, WA 98040

1.a. Thank You  
19.d. Electronic Warfare  
4.r. Nonauditory Health Effects

These Growler Operations are meant to support environmentally damaging war games in the Olympic Peninsula including the Olympic National Park. They are a threat to human health. The wildlife in the area will suffer. This must not happen. The Navy is there to protect us, not damage our health and wellbeing.

Langley, WA 98260

I am not anti-military. I support the soldiers. I do not mind Oak Harbor being what it is. I DO mind the effects of More Environmental disasters on this planet ...the threat to take over a thousand + more acres of the Reserve with 80% more jets flying over - dumping fuel over our FOOD and the danger of a crash on communities and protected land. So many things hurt in this world right now we NEED to keep our own backyard CLEAN. We do NOT need more ear shattering growlers flying over our island. PLEASE keep them out of our airspace.

1.a. Thank You

4.q. Potential Hearing Loss

6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)

6.f. Fuel Dumping

NORDLAND, WA 98358

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. We are full time residents of Marrowstone Island. Our home is on the east shore looking directly at Whidbey Island, less than four miles across the Admiralty Inlet. We can watch the touch and go flights from our front windows and our bedroom windows and can hear the jet noise. I have incorporated the well researched comments from The West Coast Action Alliance. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy.

([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.”

(<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 8.a. Cultural Resources Area of Potential Effect
- 8.b. Section 106 Process
- 8.c. Noise and Vibration Impacts to Cultural Resources



Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are “no significant impacts.” The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) “...does not allow an approach that would permit dividing a project into multiple ‘actions,’ each of which individually has an insignificant environmental impact, but which collectively have a substantial impact.” The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is “turning out fully trained, combat-ready Electronic Attack crews.” 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The “30-day waiting period” proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no

alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant."

(<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the "loser" among these communities. 8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, "[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to "identify the agency's preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . ." Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative. 9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are "tiered" for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula. 10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the "Affected Noise Environment" around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy's ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas. 11. The Navy's claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the "library" of sounds that comprise the basis for the Navy's computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in

Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS that wildlife are “presumably habituated” to noise do not apply when that noise is sporadic and intense. 12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy’s benefit, but does not benefit the public. 13. The Navy’s noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software “...do not properly account for the complex operational and noise characteristics of the new aircraft.” This report concluded that current computer models could be legally indefensible.

(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term “event,” but does not define it. Therefore, the time, duration, and number of jets in a single “event” remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public’s ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service’s draft permit, viewable at:

<https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with “...opening day and associated opening weekend of Washington State’s Big Game Hunting Season for use of rifle/guns.” While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes

guidance from the Aircraft Environmental Support Office: "Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL." This guidance further states, "Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure." If this official guidance directs Growlers to fly at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful. 20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. 22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for

which no groundwater or soil contaminant analyses have been done is not significant. 23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health advisories for two PFCs, and the Navy announced in June that it was in the process of "identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam]." Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: "Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e)." The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word "perfluoroalkyl" or "PFAS" is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft's flight operations and say that's all you're looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy's study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual "events," which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife

regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB. (<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called “Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,” (<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, [REDACTED] Nordland, WA 98358

Nordland, WA 98358

I live on Marrowstone Island, Nordland, WA and I moved here for peace, quiet, and a healthy lifestyle. Prolonged exposure to high decibel noise would impact my health, peace and equilibrium. It is my understanding that Marrowstone Island was NOT included in the DEIS. Last year we listened to jets flying as late as midnight. Loss of sleep takes a toll on health. Toxic emissions, and the effects of unburned jet fuel have an impact on human and environmental health. This will be a negative impact on East Jefferson County and Marrowstone Island. No one wants to come and vacation in this beautiful island area when you are constantly hearing jets flying over. I ask that you ensure that the final EIS is accurate, citizens' health and well being are a priority before you expand the Growler Program. The documentary was a real concern to watch. Please consider an alternative site for training our Navy Pilots. Thank you for taking my comments into consideration.

- 1.a. Thank You
- 12.n. Quality of Life
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.k. Range of Alternatives
- 4.l. Points of Interest
- 4.r. Nonauditory Health Effects
- 6.c. Hazardous Air Pollutant Compliance

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COUPEVILLE, WA 98239  
██████████  
2/23/2017

# COMMENTS

All written comments must be postmarked or received (online) by February 24, 2017, to ensure they become part of the official record.

Thank you for your interest in providing comments on the Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station (NAS) Whidbey Island. To be addressed in the Final EIS, comments must be submitted by February 24, 2017. All comments received will be reviewed by the Navy and responded to in the Final EIS.

PLEASE NOTE: Personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless required by law. The city, state, and 5-digit zip code of individuals who provide comments may be released.

**First Name:**  
**Last Name:**  
**Agency/Organization:**  
**City/Municipality:**  
**State/Province:**  select...  WA  Alabama   
select...  
**Zip/Postal Code:**  
**e-Mail:** ██████████

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Coupeville  
WA  
98239

**Comments:**  
**Would you like to join the mailing list for future updates? YES**  
**I WOULD LIKE A CD OF THE FINAL EIS WHEN AVAILABLE**

[You will be redirected to the  
Privacy Advisory: Please review the information being collected and how it will be used.

COMMENTS BEGIN ON PAGE TWO:

Written comments may be mailed to:  
EA-18G Growler EIS Project Manager  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard  
Norfolk, VA 23508  
Attn: Code EV21/SS

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 14.d. Bridges and Ferries
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.a. General Noise Modeling
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children



COUPEVILLE, WA 98239

2/23/2017

COMMENTS:

1. I am a property owner with my residence directly under the current preferred flight path approach to the OLF.
2. The noise level is the loudest from this flight path due to the altitude the flight path takes as the aircraft approaches OLF.
3. The altitude of the aircraft at this point is about 300 feet or less as the details of the pilot and aircraft are both visible from my property.
4. The flight path is too low to be able to complete a safe abort during a negative incident to either the pilot or the aircraft. If an abort is necessary it is likely the pilot would attempt an ejection while allowing the aircraft to strike the ground and potentially killing many civilians and destroying much private property.
5. The noise from the aircraft during the approach to OLF is erratic and reflects the level of proficiency of the new carrier based pilot. As repetitions increase the engine noise evens out for a more even sound. Property owners anxiety of potential negative incidences involving pilot and/or aircraft are somewhat reduced as the pilot completes his/her training flights. Why is learning and training conducted over our community when alternative solutions are being ignored?
6. The potential for a negative incident during the approach to OLF is increased during that portion of the flight that takes place within the flight path of the several breeding bald eagle families that nest in the trees at approximately the same altitude as the approach path to OLF. Other large birds soaring in this area include seagulls during the day and owls hunting at night. The waterway located at the shoreline contains many species of waterfowl that often fly as a consolidated flight group. If any of these birds are sucked into the intake of the jet engine a very serious negative incident is likely to occur.
7. Reports from the Navy have shown that the possibility of a serious negative incidence involving these aircraft is relatively high. Recently, several ground crew at ALF were injured when the canopy of a static aircraft located on the ground malfunctioned. Recent reports also indicated there was concern regarding the quality of the air in the cockpit of the aircraft. Adverse impact to the pilots were noted due to the lack of good quality air available to the pilots. This poor quality air was associated with noted reduction in pilot judgment and capability.
8. Several aircraft have been lost at ALF as well as in the vicinity of the Olympic Mountains. A most horrendous crash was recorded in Eastern Washington when an experienced crew of three struck a field and left only an unsettling black splotch on the ground.
9. The Navy has not indicated the rate of negative incidences involving its Growler or Prowler aircraft per hours of flight time. Is the Navy playing a form of "Russian Roulette" in hopes that a negative incident won't happen over the community of Admirals Cove?
10. Island County was populated by civilian farmers, residents and businesses long before the Navy occupied both ALF and OLF. The Navy now claims ownership

COUPEVILLE, WA 98239

2/23/2017

because it is occupying the ground. There does not appear to be any legal binds that would prevent the Navy to relocate the carrier training facility and program to a safer place in the State of Washington minutes away from NASWI. Grant County is fully equipped to provide the facilities, safety equipment and support for such a development. If Boeing can use the facilities to train new jet pilots for their large aircraft, surely the Navy could find a way to do the same.

11. A minimum flight time and increase in fuel costs pales when compared to the cost of damage to the community in the event of an aircraft crash. Lives, property damage and damage to the sole source of fresh water aquifer serving the community would result in considerable physical, legal and financial challenges. What fund is available to provide adequate compensation for this potential damage?
12. Property values are currently adversely impacted by the threat of all training flights scheduled over the Community of Admirals Cove, An increase in the number of training flights will reduce the value of property even more. Thus hastening the destruction of the community and the tax base upon which the County relies.
13. The proximity of State Highway 20 and the OLF poses a serious problem. The use of Hy20 is the only direct connection to means of servicing the needs of the entire island. The County relies on Hy20 and Hy525 to provide emergence services to the North and South portions of the County. The island is limited in its access to the mainland. A narrow bridge and two ferry routs provide the only means of getting on or getting off the Island with the main road connecting the three being Hy20 running adjacent to OLF. The Navy has not proposed any plan to eliminate or at least reduce to the potential impact of a crash occurring at OLF.
14. There is no indication that the Navy is anti community whereas there are many indicators that the communities located on Whidbey do appreciate and respect the presence of the Navy as a good neighbor. The Navy needs to become more of a good neighbor to the residents living on this Island.

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COUPEVILLE, WA 98239  
[REDACTED]

2/23/2017

U.S. Navy | Navy Recruiting | FOIA | No Fear Act | Veteran's Crisis Line

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Eastsound, WA 98245

I live in Eastsound, WA and I fear for the future of San Juan County if the Navy adds 36 EA-18G "Growler" fighter jets and strongly increases its number of Growler flight operations out of Whidbey Island Naval Air Station. Already the noise level is so high and frequent that several families have moved off island and others are considering doing the same. With the proposed increase, even more people would be exposed to a noise level above the threshold the Defense Department uses to help determine the compatibility of military aircraft operations with the surrounding area. I understand that the Navy chose to simulate noise levels with an out of date computer model instead of conducting actual noise measurements in the region, thus downplaying the peak noise exposures. Instead, please consider taking proper Growler noise measurements which should be key for preparing a defensible DEIS. Sincerely, [REDACTED] Eastsound, WA

- 1.a. Thank You
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.f. Noise Measurements/Modeling/On-Site Validation

Port Townsend, WA 98368

It is difficult to comprehend how, with so many valid objections to the proposed use of skies over Olympic National Park and those disturbed in several towns around it, the Navy not only ignores the terrible impact of noise and loss of revenue on those living beneath those skies but has even decided to increase the number of its planes costing the American taxpayer billions of dollars while ignoring any objections to the scheme. Visitors from around the world come to the Olympic Peninsula just for moments of peace and quiet in nature. Millions come, millions spend money which enhances the economic picture for millions of residents who depend on the many delightful experiences tourists encounter while visiting. And the peace of those who live here? Not a problem for the US Navy at all. A far from fair and comprehensive impact statement is being shoved down our throats. Why is it not possible to locate the practice area somewhere else in the US where the Navy already has a huge presence and where their presence does not have an impact as the growlers practice overhead in the desert skies of Utah for example? What sort of lame brains conjured up destroying one of the America's most treasured national parks? I have lived here for thirty years, close to Fort Worden and for all those years, have never objected to the sound of practicing jets day and night. And that is because there was no deafening sound to those jets and they flew far less frequently than growlers fly. I watched them day and night sometimes and never thought of protesting. I have several family members who have served from WW1 right through Vietnam and I have appreciated the work of those who fly dangerous missions landing on aircraft carriers in spaces the size of postage stamps. If you persist in this daily and nightly noise and in using mountain trails to park your radioactive equipment then we will know with certainty just how much our armed forces give a damn for us and our small space on earth.

1.a. Thank You

1.d. General Project Concerns

12.h. Tourism

19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training

2.n. Alternatives Considered But Eliminated

Clinton, WA 98236

I am concerned about the proposed expansion of Growler Airfield Operations at NAS Whidbey Island for several reasons: 1) Potential impact on water quality. With a limited source aquifer, our entire county could be profoundly impacted if our well water supply is harmed by toxins from Naval operations on Whidbey Island. 2) Potential impact on human health. Decibel levels, heavy metals, airborne contaminants, and contamination of soil and water are all potentially harmful and our county is full of children, retirees, and other medically sensitive people. 3) Economic impact via tourism. Our island home is known as a quaint, idyllic, and historically significant destination and our central and south island economies are built on tourism. I want to celebrate Oak Harbor's historic downtown as a community resource, but naval operations in Oak Harbor limit the amount of pleasure that can be had from visiting an otherwise beautiful commercial district. I am afraid of similar harm befalling historic Coupeville. Changing the character of this island would have a profoundly harmful effect on our character and economy. 4) Economic impact on farmers. Whidbey is home to many farming families, some newly arrived and some here for generations, and changes to soil, air, and water quality may make the soil unfit for growing food for human consumption. Additionally, growler noise may make tending and harvesting crops unsafe for workers serving farms near the OLF. As someone who patronizes local farmers for my own family produce, I am concerned about the possible impact on their businesses as well as on the grocers and families who rely on this local food supply chain. 4a) Impact on local food supply. Local food is increasingly vital in light of climate change and topsoil loss, and this is a vital time to conserve arable land and make it workable, livable, and safe. 5) Impact on home values. Whidbey is becoming known as both a retirement destination and a great place to make a living for working families who contribute to our vibrant local economy. As a homeowner and employee living and working on Whidbey Island, I'm afraid that an increase in Growler activity will economically depress our county and make my home value drop. As a working, middle class single mother of three I depend on my home equity as the most significant financial investment of my life. 6) Impact on non-profits. As a haven for the arts and social services, South Whidbey has a reputation for healthy living, safe beautiful surroundings, and a robust social support network in trusted community. Increased growler activity could throw all that out of balance, by changing the economic, environmental, and demographic face of the county and making it harder to do what I do (communications in an educational non-profit setting) by making the island a more dangerous and less pleasant place for those we serve in the non-profit industry. 7) Potential impact on wildlife. The toxins and noises from Growler flights have the potential to disrupt feeding, mating, and other social patterns of wildlife throughout our region, and in a time when human activity needs to be carefully balanced with the needs of our ecosystem and non-human community I'm very concerned for the potential harm to salmon, shellfish, bird, plant, and whale activity. This, in turn, could impact the culinary, scientific, and other communities whose livelihoods depend on healthy interrelationships between species.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.p. Local Differences in Economy
- 17.a. Hazardous Materials and Waste Impacts
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

1.a. Thank You

Olympia, WA 98516

Living next to JBLM I am familiar with noise from military operations. I also frequently visit Whidbey Island. The importance of the operations at NASWI far exceed any minor issues with noise. The Navy-Marine Corps as well as our allies must train and NASWI offers the best opportunity. People will as complain be it noise or traffic but the Navy must stay and they must train. Don't impede their effort.

Seattle, WA 98177

Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its "study area" is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy.

([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as "normally unacceptable" and above 75 as being "unacceptable."

(<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: • 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; • A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); • 2012 EA (26 Growlers including 5 from a reserve unit); • 2014 EA (Growler electronic warfare activity); • 2015 EIS discussing electronic warfare training and testing activity; • The current 2016-2017 DEIS (36 Growlers); • And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 19.a. Scope of Cumulative Analysis
- 19.b. Revised Cumulative Impacts Analysis
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 19.h. Cumulative Impacts on Biological Resources
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.d. Arrivals and Departures
- 4.a. General Noise Modeling
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 8.a. Cultural Resources Area of Potential Effect
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.j. City of Port Townsend Cultural Resources



limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are “no significant impacts.” The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) “...does not allow an approach that would permit dividing a project into multiple ‘actions,’ each of which individually has an insignificant environmental impact, but which collectively have a substantial impact.” The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is “turning out fully trained, combat-ready Electronic Attack crews.” 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The “30-day waiting period” proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, “...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives.” According to a memo from the President’s Council on Environmental Quality (CEQ) to all federal agencies, “Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply

desirable from the standpoint of the applicant.”

(<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the “loser” among these communities. 8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, “[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to “identify the agency's preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . .” Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative. 9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are “tiered” for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula. 10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the “Affected Noise Environment” around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy’s ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas. 11. The Navy’s claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the “library” of sounds that comprise the basis for the Navy’s computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS that wildlife are “presumably habituated” to noise do not apply when that noise is sporadic

and intense. 12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy's benefit, but does not benefit the public. 13. The Navy's noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software "...do not properly account for the complex operational and noise characteristics of the new aircraft." This report concluded that current computer models could be legally indefensible.

(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term "event," but does not define it. Therefore, the time, duration, and number of jets in a single "event" remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public's ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service's draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with "...opening day and associated opening weekend of Washington State's Big Game Hunting Season for use of rifle/guns." While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: "Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL." This guidance further states, "Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure." If this official guidance directs Growlers to fly at such low altitudes, why did the Navy not disclose this in any previous NEPA

documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful. 20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. 22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant. 23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health advisories for two PFCs, and the Navy announced in June that it was in the process of

“identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam].” Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: “Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e).” The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word “perfluoroalkyl” or “PFAS” is not mentioned once in the entire 1400-page DEIS, nor is it mentioned in the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft’s flight operations and say that’s all you’re looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy’s study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual “events,” which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly

likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB.

(<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,"

(<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, [REDACTED]

**Draft Environmental Impact Statement Comment Form**  
*EA-18G Growler Airfield Operations at NAS Whidbey Island Complex*

Comments must be postmarked or submitted online by January 25, 2017

Online at: [www.whidbeyeis.com](http://www.whidbeyeis.com)

By mail at Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

All comments submitted by January 25, 2017 will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
*resident of Island County, on Whidbey Island*
3. Address [REDACTED], *Oak Harbor WA 98277*
4. Email [REDACTED]
5. Please check here  if you would NOT like to be on the mailing list
6. Please check here  if you would like to receive a CD of the final EIS when available.

**Comments**

For additional information see **Coupeville Community Allies** at [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

1. **Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture.** Increasing OLF operations by 36 % to 475%, with up to 135 flight operations daily, will double the residential areas and increase by 10-fold the commercial areas impacted by noise. This is a burden greater than the Coupeville/Central Whidbey community can bear.
2. **Increased operations at OLF risk greater aquifer and well contamination.** Wells near OLF have now found to be contaminated with PFOA compounds from Navy firefighting foam, which the Navy continues to use for aircraft fires. The extent has not been determined nor have results been shared with the community. There is no mitigation plan in place.

(over)

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.i. Housing Access and Affordability
- 12.j. Property Values
- 12.m. Education Impacts
- 12.n. Quality of Life
- 13.a. Environmental Justice Impacts
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments
- 2.i. Proposed Action
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

3. The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.
4. An additional 880-1,574 personnel and dependents would severely impact our tight housing market, decreasing the already low stock of affordable housing on Whidbey Island.
5. The Navy did not adequately look at siting new Growler aircraft elsewhere, despite this being the #1 request from the community during the Navy's prior scoping forums.
6. Single-siting Growlers at NASWI presents a major terrorist risk to our Island, which is served by one bridge and two ferries. All active electronic warfare jets in the US Military would be at NASWI.
7. The Growlers are at risk for more mishaps and crashes due to problems with their onboard oxygen system that can cause pilot hypoxia, with over 100 incidents in all F/A-18 airframes in 2015 alone. Increases in OLF operations increase the risk of crashes on Whidbey Island and in Puget Sound.

Additional Comments: *These concerns above are my concerns. I was astonished to learn of the dramatic increase in flight operations now planned. This is not a reasonable plan for our community and the surrounding communities that will be affected.*

*Please take the time to interview Whidbey Islanders. Many still do not know the extent of the planned increase. If indeed 6,100 yearly flights is increased to 35,000, there will then be increased animosity between the WINAB and the island community members.*

*Please extend the EIS and comment period as well as the concerns I have listed.*

Please mail your comment to:  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

Comments must be postmarked by January 25, 2017





# Public Meeting Comment Form

Thank you for attending the public meeting on the Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) **Provide written comments** at today's public meeting; (2) **Speak with the stenographer**, who will record your comments; (3) **Submit your comments on the project website** at [www.whidbeyeis.com](http://www.whidbeyeis.com); or (4) **Write your comments and mail them** to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name
2. Organization/Affiliation
3. Address
4. E-mail
5. Please check here  if you would NOT like to be on the mailing list
6. Please check here  if you would like to receive a CD of the Final EIS when available

CONSIDER ROUTE CHANGES TO ALTERNATIVE ALTITUDE OR COURSE TO AVOID ANACORTES CITY AND HIGH SCHOOL (HIGH DENSITY)  
 A) HIGHWAY OVER FIDALCO BAY & CITY - OR  
 B) OVER LOW POPULATION GUEMES/CYPRUS WOULD BE A COURSE ALTERNATIVE  
 WE REALIZE THIS ROUTE IS ~~RARE~~ NOT USED OFTEN, BUT WHEN IT IS, IT IS LOUD.  
 TABLES 4.2, 3 / 4 / 5 / 6 WERE VERY HELPFUL

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 3.a. Aircraft Operations

Vashon, WA 98070

The Navy's DEIS ignores the harmful consequences of Growler operations taking place. It does not address the true environmental and public health consequences of planned Growler increases. The DEIS is flawed by design and prepared in violation of the National Environmental Policy Act. The Navy should relocate touch-and-go Growler training from Whidbey Island to another less populated and environmentally sensitive location.


- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.d. General Project Concerns
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.n. Alternatives Considered But Eliminated


Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:  
EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

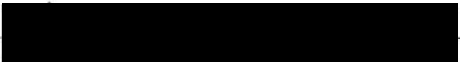
- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 2.c. Compliance with the National Environmental Policy Act
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- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

1. First Name 

2. Last Name 

3. Organization/Affiliation \_\_\_\_\_

4. City, State, ZIP LOPEZ ISLAND 98261

5. E-mail 

6. Please check here  if you would NOT like to be on the mailing list

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## Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

### January, 2017 Comments

Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)

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**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**
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- 12. Add your own comments here:

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Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

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EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

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*Please do an environmental impact study that addresses the above concerns and takes the suggested actions*



Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

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5.a. Accident Potential Zones
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1. First Name [redacted]
2. Last Name [redacted]
3. Organization/Affiliation Religion Society of Friends, Lopez Medical Clinic
4. City, State, ZIP Lopez Is, WA 98261
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I share your desire to <sup>keep</sup> ~~have~~ our country safe.  
 I think we can do that and not make  
 the lives of our residents on Lopez Island  
 miserable because of the growlers' noise  
 pollution. The emitted noise can be abated.

## Draft Environmental Impact Statement for EA-18G “Growler” Airfield Operations at Naval Air Station Whidbey Island Complex

### January, 2017 Comments

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# Public Meeting Comment Form

Thank you for attending the public meeting on the Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) Provide written comments at today's public meeting; (2) Speak with the stenographer, who will record your comments; (3) Submit your comments on the project website at www.whidbeyeis.com; or (4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name

2. Organization/Affiliation

3. Address

4. E-mail

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

① If the main use of the growler is to interrupt electronic attack capabilities, why does the airplane have to be so noisy?

② Why can't the Navy substitute more "simulation" training for actual growler flights?

③ Why do you have 2 plane flyovers in formation over Lopez?

⊕ I believe the NAVY should monitor noise levels, using sound level meters, at points of interest (school, park (National Monument at Iceberg), town) before completion of the EIS. Modeling does it cut it. Actual measurements to establish an honest benchmark is needed

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

before deployment of the Navy plan for more growlers

- 1.a. Thank You
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⑤ Why do the crawlers have to climb, thereby increasing the noise factor, over Lopez?

For more information, please visit the project website at [whidbeyeis.com](http://whidbeyeis.com)

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Please conduct a full environmental study addressing both concerns and actions in the above portion of this letter.  
Thank you!



Langley, WA 98260

Please consider the significant environmental impacts of the EA-18G Growler Airfield Operations at NAS Whidbey Island. Navy's Draft Environmental Impact Statement (DEIS) regarding the Growler Jet Expansion on Whidbey Island. As I understand it, the DEIS does not effectively address: -water quality & aquifer contamination -noise impact on children/schools -natural resources impact -crash frequency -economic impact (tourism, property values)

1.a. Thank You

2.b. Scope of the Environmental Impact Statement and Analysis Conducted

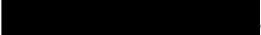
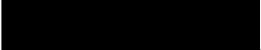
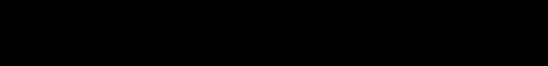
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*We came to Lopez in order to have a quiet, peaceful environment. The Growlers have been very disturbing and we are not pleased.*

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# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) *Provide written comments at today's public meeting;* (2) *Speak with the stenographer, who will record your comments;* (3) *Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);* or (4) *Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.*

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]

2. Organization/Affiliation Windsmere Real Estate

3. Address [REDACTED] OH WA 98277

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

Deception Pass Park is a treasure of our state. I am concerned  
at the impact the additional flights will have on enjoying the  
amazing beauty of the park and especially camping there.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Please print • Additional room is provided on back**  
**Please drop this form into one of the comment boxes here at the public meeting or mail to:**  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS  
**YOUR INPUT MATTERS**

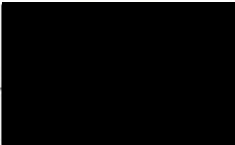
- 1.a. Thank You
- 7.i. Deception Pass State Park and Other State Parks


Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:

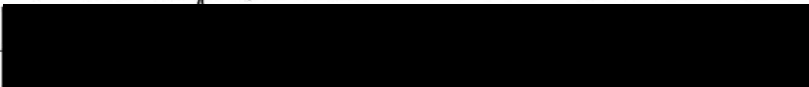
EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

1. First Name 

2. Last Name 

3. Organization/Affiliation Quiet Skies

4. City, State, ZIP Friday Harbor WA 98250

5. E-mail 

6. Please check here  if you would NOT like to be on the mailing list

7. Please check here  if you would like your name/address kept private

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 12.j. Property Values
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

**Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex**

**January, 2017 Comments**

*Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)*

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.  
**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**
2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.  
**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**
3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.  
**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**
4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.  
**Action: Noise levels should only be averaged over active flying days.**
5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.  
**Action: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**
6. The Draft includes some independent noise measurements and ignores others.  
**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**

7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion."

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

12. Add your own comments here:

*The impact of the growlers on our environment and our lives is real! Please pay attention to this issue. As a past [REDACTED] I have worked with Whidby Naval Air Station personnel, and I know there are ways to mitigate the noise!*



1.a. Thank You

Coupeville, WA 98239

I am writing to let the Navy and Island County government know that we appreciate the Navy and Growlers here on Whidbey Island. I know that there is a very vocal minority who would like decision makers to think that the Navy is unwelcome here, but many of those folks are saying so in an effort to speculate on property values near or around the Navy OLF near Coupeville. Please do not be disheartened by the rhetoric spouted forth by the anti-OLF minority as they DO NOT speak for the majority of Whidbey Island residents. Thank you all for your dedicated service.

Port Townsend, WA 98368

- 1.a. Thank You
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects

Dear Growler EIS Project Manager, My husband and I, both in our 60s, live in the North Beach area of Port Townsend. We have lied awake many a night listening to the growlers (and other?) flying over our home again, and again and again. I understand that you need to train but increasing this intrusive, sleep defying noise by potentially more than 500% is deeply troubling to us. We have both had cancer, we moved here for the quiet and the peace. Please consider our mental and physical health as well as all of the people that live within ear shot of your flight patterns. You have the right to train, we have the right to sleep and experience peace in our own homes. Thank you for your consideration,

████████████████████

1.a. Thank You

Lopez Island, WA 98261

I do not want more airplanes creating noise!



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Thank you for attending the public meeting on the Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.

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1. Name [Redacted]

2. Organization/Affiliation defender of open, quiet skies

3. Address [Redacted]

4. E-mail Brt Townsend WA 9836

5. Please check here  if you would NOT like to be on the mailing list more propagand and lies, why -  
6. Please check here  if you would like to receive a CD of the Final EIS when available bother:

This event is obscene as are the activities you plan. You should be ashamed to perpetrate lies. You should be ashamed of the sham this event is. Not loud? Not harmful to every living thing? You lie. Your own Youtube recruitment video alone proves it. Just how

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

stupid think we are OBSCENE. do you

Port Townsend, WA 98368

The Navy's DEIS ignores the harmful consequences of Growler operations taking place. It does not address the true environmental and public health consequences of planned Growler increases. The DEIS is flawed by design and prepared in violation of the National Environmental Policy Act. The Navy should relocate touch-and-go Growler training from Whidbey Island to another less populated and environmentally sensitive location. On COER's position concerning the DEIS: we are reviewing the DEIS and will prepare detailed comments to the Navy. This is not being done to legitimize the Navy's actions, but rather to set the stage for a legal challenge to the adequacy of DEIS. The following are a few observations: The DEIS misrepresents the impacts of Growler noise. No measurements of noise were taken in communities. Instead, the Navy used computer modeling that averaged periods of noise with long periods of silence. The DEIS ignores overwhelming scientific and medical evidence of harms caused by hazardous Growler noise. It presents no evidence that those harms are not now occurring and will not occur in the future. ALL of the alternatives for Growler operations proposed by the Navy will create more noise and harms in communities throughout the Puget Sound. The DEIS's alternatives only shift the burden of harms between communities.

- 1.a. Thank You
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.r. Nonauditory Health Effects

Environmental Impact Statement Comment Form  
 EA-18G Growler Airfield Operations at NAS Whidbey Island Complex

Comments must be postmarked or submitted online by February 24, 2017

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
 \_\_\_\_\_ RESIDENT \_\_\_\_\_

3. Address \_\_\_\_\_

4. Email \_\_\_\_\_ COUPEVILLE, WA 98237 \_\_\_\_\_

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

Comments

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound. IMPACT ON EXISTING COUPEVILLE HEALTH ISSUES - NOISE / VIBRATION
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area. INCREASE IN MY BASE FOR SCHOOLS FOR TRANSIT STUDENT POPULATION FROM BASE (CENTRAL)
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise. FOR BOTH MY PROPERTIES -

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.

Noise impacts on commercial properties including agriculture. - EQUIVOCAL IMPACT

Aquifer and well contamination. - 22 SIGNIFICANT Fm OUR HOUSES

Additional Concerns: (IN CRASH ZONE) - TBD - BY TESTING - PROJECTUAL

The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.

The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.

The impact on marine and terrestrial wildlife.

The major security risk for Whidbey Island by siting all Growlers here.

Mishaps and crash risks due to problems such as their onboard oxygen system.

Please include any additional comments and concerns here:

ONE THING TO HAVE PRIOR FLIGHT #S & PHASES -  
FEEL THE IMPACT SHOULD BE MITIGATED BY ASSIGNING TO  
OTHER SITES - THE GROWTH OF PHASES & FLIGHTS - THE FISCAL  
IMPACT ON PROPERTIES - IN & OUT OF CRASH ZONES + H2O  
CONTAMINATION SHOULD BE RECOGNIZED & MITIGATED - NO ONE  
KNOWS OF THIS POTENTIAL ON BEING THE PROPERTY 10-20  
YRS AGO - UTILIZE "TESTING TECHNOLOGY" TO TRAIN W/ NEW  
STIMULATIONS - 3D ETC -

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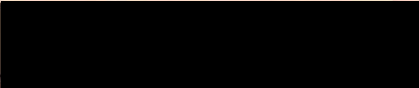
For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)


Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.


Environmental Impact Statement Comment Form  
EA-18G Growler Airfield Operations at NAS Whidbey Island Complex

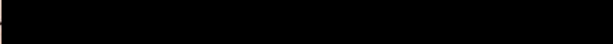
Comments must be postmarked or submitted online by February 24, 2017  
SEND COPIES OF YOUR COMMENTS TO OUR ELECTED OFFICIALS

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
By mail at Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

1. Name 

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)   
*Resident, Farmer, Business owner of*

3. Address  *Freeland*

4. Email 

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(over)

- 1.a. Thank You
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- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
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- 7.j. Impacts on Outdoor Sports



- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquifer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

I am deeply concerned about potential aquifer contamination + the known contamination of private wells near the OLF. Being a farmer, I'm aware of <sup>the</sup> need to protect the health of our H<sub>2</sub>O, air, + soil to produce the amazing produce that comes out of Whidbey farms. Expanded flights increase the chance of future use of flame retardants + more H<sub>2</sub>O contamination. This needs to be addressed in the DEIS.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

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Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

Freeland, WA 98249

Late last year we learned that a fire-fighting foam used by the Navy has contaminated some of our island wells. Many questions remain about how many wells are affected, what crops irrigated by that water are affected and how we will return our most vital resource, water, to as pristine a state as possible. I hope the Navy will not expand anything until the magnitude of issue of chemicals in local wells is fully understood and addressed. All people deserve to have healthy water and a healthy environment to call home. So far, Coupeville and the surrounding area provides this for its residents. Please address how this will continue to be the case if the Navy were to expand.

Freeland, WA 98249

1.a. Thank You  
12.b. Invisible Costs  
12.c. Socioeconomic Impacts

Recently, a private economic study was produced by Michael Shuman who is an internationally recognized expert on local economies. In his research he found that property values in areas affected by excessive jet noise have declined by nearly 10 million dollars. The Navy must consider the severe economic burden it already ready puts on long-time Whidbey residents, a burden that will severely amplify with the growler expansion. Many people we know (especially farmers) have their life savings and retirements locked into their land. It is unfair that a lifetime of planning, investment and work be pulled out from under these people as a result of a naval expansion that is out of their control. Please consider the economic implications this expansion will have on all the property owners under the jet path. It is sure to be devastating.

Freeland, WA 98249

There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant." (<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the "loser" among these communities. If the Navy wants to be a part of the Coupeville Community and not have every person it employs to be deeply begrudged by the current community, it would be wise to at very least work to mitigate the deafening and traumatizing noise the growlers cause. I have young friends who purchased land in the flight path just a few months before this expansion was publicized. They invested their inheritance and life savings to do so--- in order to enjoy the quiet, pastoral beauty offered on Whidbey and to preserve a large piece of land in natural habitat for wildlife. Not only will their health and the welfare of the animals be put at risk by the noise, they and countless other landowners will have invested all that they had in a property that is not the place they thought. They now own something they likely cannot sell nor even enjoy. It's a tragedy and should be addressed by noise mitigation technology so that the Navy and the current community can live decently side by side.

- 1.a. Thank You
- 12.j. Property Values
- 12.n. Quality of Life
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.t. Noise Mitigation

Freeland, WA 98249

1.a. Thank You  
11.a. Groundwater  
11.d. Per- and Polyfluoroalkyl Substances

The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. Farmers can't water crops with drinking water and Coupeville is an extremely important farming community with some of the very best soils in the country. Countless families' livelihoods are at risk with the contamination of the soil and water. The Historic Agricultural Reserve is a unique national treasure and must be protected from contamination. It is crucial farmers are able to continue farming there to uphold the integrity of this uniquely designated locale. Please look out for the farm families who have been there for over 5 generations. Their need for healthy soil, water, and farming environment free from constant deafening growler noise must be addressed in this DEIS. Thank you for your very serious consideration of the importance of the farmers to this community and to our country. Without a secure food system we are not a secure country. The DEIS must consider other locations where farming is not such a center point of the economy and the soils are not so precious. Thank you.

Freeland, WA 98249

Drinking Water Pollution Coupeville's water supply well next to the OLF is contaminated with the Navy's toxic chemicals at concerning levels. An accident at the OLF could cause more contamination. Increasing operations by Navy Growlers will increase the threat to Coupeville's drinking water. Also, the use of these chemicals puts local farmers' crops at risk, which puts the historically valuable role farmers play for Island County at risk. The need to protect farmers and our local food supply is a security concern and a moral concern. Both need to be addressed in the DEIS. Also, alternative sites were not at all adequately considered in the DEIS. Please find other options, where fewer people and less precious soils will be impacted. The Coupeville area has some of the best soils in the nation and should continue to grow food for the security of our country's food system into perpetuity.

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

December 9, 2016

To Whom it May Concern,

I am writing to express my sincere concern regarding the Navy's current DEIS.

I am worried about about the serious toll growler noise is taking on our local farmers' health and their willingness to continue supplying our community with the food it needs to sustain itself. Since we live on an island, a thriving local food supply is vital for our security and longevity. If a natural or military disaster were to strike, an island community absolutely must have its own food source. By flying planes overhead that are damaging to farmers and livestock, we discourage local growers from continuing to contribute to Whidbey's self-sufficiency and safety.

Being a member of the local farming community myself, I know that Growler noise as it currently stands, is causing our current farmers to rethink growing on Whidbey and is discouraging future farmers from moving here. When we were looking for acreage, we dismissed every piece of land in the flight path, and instead opted for far inferior soils without the potential hearing and psychological damage. This is not only unfortunate, I believe it's unsafe. We need farmers to stay and continue to move here. Additionally, since the Coupeville prairie has some of the richest agricultural soils in North America it would be a tragedy and huge opportunity lost if it were to stop being used to feed our country.

I also know that tourism is one of the mainstays of our island economy. Increased Growler traffic will harm countless small businesses who depend on the peaceful, pastoral quality of Whidbey to draw in off island visitors. Without rural serenity and quiet, we lose the main selling points of our island for this enormous portion our community's income and well-being.

Please consider re-locating the Navy's Touch and Go Program from Whidbey Island, an area of rich historic, natural and agricultural value. Without these qualities, our safety and economy will suffer irreparable damage.

Thanks for your thoughtful consideration of this letter.

Sincerely,

  
  
Freeland, WA

- 1.a. Thank You
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.k. Compensation to Citizens for Private Property
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Anacortes, WA 98221

1.a. Thank You

4.r. Nonauditory Health Effects

The extremely loud noise created by the Growler jets flying out of NAS Whidbey Island is so horrific that I feel my home is located in a war zone. The Growlers fly very low and directly over our home any day of the week from early morning until midnight. The Growlers are so loud you cannot hear what the person standing right next to you is saying inside our home. This constant extremely loud noise makes me very irritable, is detrimental my health and ruins my ability to enjoy life my our own home. The property my wife and I live on has been in our family since the 1930's long before NAS Whidbey. NAS Whidbey started with relatively quiet prop planes and has escalated to this outrageous noise levels that private citizens are subjected to now.



Anacortes, WA 98221

1.a. Thank You

4.r. Nonauditory Health Effects

The extremely loud noise created by the Growler jets flying out of NAS Whidbey Island is so horrific that I feel my home is located in a war zone. The Growlers fly very low and directly over our home any day of the week from early morning until midnight. The Growlers are so loud you cannot hear what the person standing right next to you is saying inside our home. This constant extremely loud noise makes me very irritable, is detrimental my health and ruins my ability to enjoy life my our own home. The property my wife and I live on has been in our family since the 1930's long before NAS Whidbey. NAS Whidbey started with relatively quiet prop planes and has escalated to this outrageous noise levels that private citizens are subjected to now.

1.a. Thank You

coupeville, WA 98239

the proposed amount of flights will be seriously hazardous to the citizens in the area.

Coupeville, WA 98239

1.a. Thank You

4.r. Nonauditory Health Effects

6.b. National Ambient Air Quality Standards Compliance

I have been a supporter of the Navy in the past. But the proposed flight frequency and its noise exerting on a residential neighborhood is un-acceptable. It not only cause noise population, but also air pollution, and health damage to the citizens in the area.

Coupeville, WA 98239

I have been a supporter of the Navy in the past. But the proposed flight frequency and its noise exerting on a residential neighborhood is un-acceptable. It not only cause noise population, but also air pollution, and health damage to the citizens in the area. I oppose the planned frequency.

1.a. Thank You

4.r. Nonauditory Health Effects

6.b. National Ambient Air Quality Standards Compliance

Seattle, WA 98122

The Olympic Peninsula is one of our state's treasures. It is a place of refuge for people and wildlife. This plan would destroy one of last natural places, as well as infringing on tribal areas and causing untold damage to wildlife.

1.a. Thank You

19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training

7.d. Recreation and Wilderness Analysis and Study Area

9.a. Consideration of Tribes

**Comments on EIS Study for Increased Flight Operations on Whidbey Island**

November 9, 2016

*Introduction*

The three scenarios for proposed increase in flight operations on Whidbey Island have the greatest impact on Coupeville and its surrounding regions, not in the Oak Harbor area. The table below, taken from the Draft EIS study, shows the three scenarios.

<b>Alternative</b>	<b>Ault Field</b>	<b>OLF Coupeville</b>	<b>Total FCLPs</b>
<b>Alternative 1</b>			
Scenario A (20/80 FCLP Split)	8,700	35,100	43,800
Scenario B (50/50 FCLP Split)	21,900	21,900	43,800
Scenario C (80/20 FCLP Split)	35,100	8,800	43,900
<b>Alternative 2</b>			
Scenario A (20/80 FCLP Split)	8,400	33,600	42,000
Scenario B (50/50 FCLP Split)	21,000	21,000	42,000
Scenario C (80/20 FCLP Split)	33,600	8,400	42,000
<b>Alternative 3</b>			
Scenario A (20/80 FCLP Split)	8,400	33,500	41,900
Scenario B (50/50 FCLP Split)	21,000	20,900	41,900
Scenario C (80/20 FCLP Split)	33,500	8,300	41,800
<b>No Action Alternative</b>	<b>14,700</b>	<b>6,100</b>	<b>20,800</b>

There is an inconsistency in the way that the EIS noise study was done, in that very few “points of interest” are included in Coupeville and surrounding areas, *despite the potentially higher impact of increased flight operations on that region*. The noise study appears to place great emphasis on the number of people – and points of interest – that are affected, which will likely prejudice a final recommendation on moving more operations to the OLF. This weighting essentially “devalues” the problems and issues raised by Coupeville residents, allowing the larger population base in Oak Harbor to export the noise and nuisance problems of increased flight operations to its smaller neighbor.

Oak Harbor is the home of the Naval Air Station, and it derives large economic benefits from that installation. However, an indirect cost associated with that installation is accommodating changes in the operation of the base. Thus, increases in noise are to be expected by Oak Harbor residents. Coupeville is more than 12 miles (by road) from Oak Harbor, with little direct benefit from the base. Furthermore, the increased noise from aircraft operations will detract from its appeal as a tourist center, which is increasingly important for this region.

Although not part of the EIS study, safety is another concern, which should be added to the topics under discussion in forums that are held to discuss the impact of increased flight operations to the community.

- 1.a. Thank You
- 12.h. Tourism
- 12.p. Local Differences in Economy
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.l. Points of Interest
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

### *Detailed Comments and Recommendations*

#### Recommendation from among the Three Scenarios

Scenario C, with the smallest number of increased OLF operations, is clearly preferred by residents within and around Coupeville. This scenario is much fairer to Coupeville citizens and businesses than the others, given their distance from the main base in Oak Harbor, and the very large increase in OLF flight operations that would result from Scenarios A and B.

#### EIS Noise Study

There are several issues where the EIS noise study is incomplete or biased.

First, as noted in the introduction, there are far more “Points of Interest” in areas near Oak Harbor than near Coupeville. This effectively weights the noise study in favor of moving more operations away from that area, despite the great benefit derived from the Naval Base by the city, and the (implied) expectation that changes in base operations will be accepted by the local population as part of their obligation to the Naval Base. The noise study should recognize that

Second, the Coupeville elementary school is sometimes included as a “POI” but not always. At least one school from Coupeville should be included throughout the study. It is also surprising that the main part of Coupeville is not included. That area has a lot to lose if increased noise from air operations affects tourism. It should not only be included as a POI, but the potential impact of noise on the Coupeville economy should also be included in the study.

Third, the only public hospital on Whidbey Island is located in Coupeville. Surprisingly this was not mentioned in the noise study. The high noise level – and the way in which such noise develops suddenly – could have a large impact on health care. The hospital, which is undergoing a significant expansion, and its nearby surgical center – should be added as a POI. The impact of aircraft noise and unexpected, sudden increases in noise from low-altitude operations on the hospital – should be added to the noise study.

#### **Final Recommendation**

In examining the preliminary EIS study, it is clear that there is an underlying emphasis on continuing to expand operations at the Whidbey Island air station rather than limiting its operations and expanding operation of these critical aircraft to other, more remote areas, where the increase noise and safety hazards associated with their operation could be better accommodated. Although the study briefly considers some options, they are quickly discarded in favor of expanded operation at Whidbey NAS.

It is always less costly to increase operations at this base compared to other alternatives. However, the population of Whidbey Island has expanded significantly since the OLF operation was initially built. The excessive noise and negative impact of these operations on a region which involves pristine parks and waterways, Ebey's Landing, and a (normally) peaceful rural setting will become increasingly difficult to justify, and will eventually result in a political backlash against the Navy. Establishing longer-term plans to cap NAS operations in this region would be a better solution than continuing to degrade the quality of life in this region. It would also provide options if an unfortunate event – such as an aircraft crash – increased public pressure to curtail operations near the base.



Coupeville, Washington

cc: Senator Patty Murray  
Gov. Jay Inslee



Coupeville, WA 98239

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP).

Coupeville, WA 98239

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.g. Average Annual Day/Average Busy Day Noise Levels

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.

Coupeville, WA 98239

The DEIS claim that the JGL noise study was “flawed” is disingenuous and unsupported, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data.

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports

Coupeville, WA 98239

1.a. Thank You

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- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports

Coupeville, WA 98239

1.a. Thank You  
4.j. Other Reports

The DEIS misconstrued important finding of the National Park Service's 2015 noise study at Ebey's Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconstruct has to be credibly revised to properly characterize the real impacts.

Coupeville, WA 98239

1.a. Thank You

4.r. Nonauditory Health Effects

Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature.



Coupeville, WA 98239

1.a. Thank You  
4.q. Potential Hearing Loss

The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined hazardous noise zone threshold (i.e., "an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month").

Coupeville, WA 98239

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Coupeville, WA 98239

1.a. Thank You  
7.c. Noise Disclosure

Island County land-use policies, plans, as reflected by the construction permits issued, have largely defied the Navy's 2005 AICUZ directives for Outlying Field Coupeville, such as no residences in a noise zone 2. Whether due to willful intent to ignore by the County or to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and attendant land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should be immediately advocating to the County to place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved.

Coupeville, WA 98239

The two most dangerous aspects of flying are the approach, landing and takeoff -- in other words most of the OLFC flight path. The risks are significant (a) because of significant encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes with the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs off a suitable 21st century off-Whidbey site.

- 1.a. Thank You
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

Coupeville, WA 98239

1.a. Thank You

13.a. Environmental Justice Impacts

Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise.

Coupeville, WA 98239

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of these wells. Leakage of PFAS in storage or use in a crash event is a hugely relevant environmental impact must be addressed and the public must be given the opportunity to comment.

Coupeville, WA 98239

The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% overestimated use of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

- 1.a. Thank You
- 3.e. Field Carrier Landing Practice Patterns
- 3.f. Field Carrier Landing Practice Operation Totals
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo

Coupeville, WA 98239

1.a. Thank You  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the "percent probability of awakening for all scenarios..." While music torture is still permitted under US law, the United National Convention against Torture defines torture as "any act by which severe pain of suffering, whether physical or mental..." Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.



Coupeville, WA 98239

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and analyzed.

Coupeville, WA 98239

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4.r. Nonauditory Health Effects

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Coupeville, WA 98239

1.a. Thank You  
4.q. Potential Hearing Loss

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

Coupeville, WA 98239

1.a. Thank You

4.r. Nonauditory Health Effects

The DEIS fails to adequately address the effects of high noise levels during pregnancy provoking significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.

1.a. Thank You

Oak Harbor, WA 98277

I support NASWI. I am retired Navy and I live in Oak Harbor. I love this town and this town would not exist if it were not for the military. NASWI is a good neighbor if you do your proper homework and don't buy a house under a runway. I support NASWI and love this military town.



# Public Meeting Comment Form

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To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) *Provide written comments at today's public meeting;* (2) *Speak with the stenographer, who will record your comments;* (3) *Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);* or (4) *Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.*

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1. Name [REDACTED]

2. Organization/Affiliation \_\_\_\_\_

3. Address [REDACTED] LOPEZ 98261

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

MOST OF THE NOISE FOR LOPEZ RESIDENTS OCCURS DURING LANDING OPS.

MITIGATION STRATEGIES HAVE BEEN PROPOSED WHICH WILL CERTAINLY HELP. I UNDERSTAND THE FLIITS ARE GIVEN TRAINING - HOWEVER I AM NOT CLEAR THAT THIS TRAINING IS ALSO GIVEN TO THE AIR TRAFFIC CONTROLLERS

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 4.a. General Noise Modeling
- 4.t. Noise Mitigation

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WHAT STEPS CAN THE CONCERNED COMMUNITY TAKE TO DETERMINE IF THE MITIGATION STRATEGIES REMAIN IMPORTANT SOPs IN THE FUTURE?

AN INCREASE IN AIRCRAFT PERSONNEL WILL RESULT IN MORE FLIGHTS. LANDING OPS REQUIRE AN INCREASED USE OF FLIGHT CORRIDORS THAT IMPACT LOWER RESIDENS. CAN TRAINING BE STRUCTURED TO LIMIT THE NUMBER OF AIRCRAFT CONCURRENTLY REQUEST A LANDING "SLOT"?

For more information, please visit the project website at [whidbeyis.com](http://whidbeyis.com)

Please print

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**YOUR INPUT MATTERS**

Oak Bay, British Columbia V8S 4X8

1.a. Thank You  
4.t. Noise Mitigation

My family and I hear the growler Jet often. Please try to reduce the Noise level - especially at night.



Anacortes, WA 98221

I question the analysis of the NPS study of jets noise in visitor experience. The extreme noise levels destroys any nature inspired visit to all of Ebey's Reserve. The noise also rattles my windows at [REDACTED] in Anacortes WA. It leaves me shaken and highly stressed by the 'shock and awe' of war time noise.

- 1.a. Thank You
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 7.g. Ebey's Landing National Historical Reserve

Anacortes, WA 98221

- 1.a. Thank You
- 2.k. Range of Alternatives

My understanding of DEIS is that it has NOT properly complied with NEPA in examining off island / less populated areas and areas of less environmental impact than the fragile marine environment here.

Anacortes, WA 98221

I question the analysis of the NPS study of jets noise in visitor experience. The extreme noise levels destroys any nature inspired visit to all of Ebey's Reserve. The noise also rattles my windows at [REDACTED] in Anacortes WA. It leaves me shaken and highly stressed by the 'shock and awe' of war time noise.

- 1.a. Thank You
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 7.g. Ebey's Landing National Historical Reserve

, WA 98368

Let's do what's right. Stop the abusive noise over this pristine area. This noise is so disruptive, it effects physical and mental health. Not to mention the effects on animals, marine life, tourism, and the poor people that live under the ever flying jets. Adding more will increase the worst. Anxiety!! Please Navy find alternative routes over less populated areas.

- 1.a. Thank You
- 12.n. Quality of Life
- 2.k. Range of Alternatives
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Port Townsend, WA 98368

1.a. Thank You  
7.c. Noise Disclosure

Island County has unconscionably ignored the Navy's 2005 AICUZ land-use directives for Outlying Field Coupeville, especially as reflected by construction permits issued in Noise Zone 2 areas, where the AICUZ stipulates no residences should occur, as well as other land uses. Whether due to the County's willful intent to ignore or due to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and similar land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should immediately advocate that the County place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved.

Fox island, WA 98333

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.l. No Action Alternative

At the request of the citizens who you are claiming to protect, I urge you to consider a no action alternative, to explore other options, to honor the enabling legislation that was brought about to preserve this community and their way of life.



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1. Name [REDACTED]
2. Organization/Affiliation Resident
3. Address [REDACTED], Coupeville
4. E-mail [REDACTED]
5. Please check here  if you would NOT like to be on the mailing list
6. Please check here  if you would like to receive a CD of the Final EIS when available

*First, thank you for hosting this forum. After viewing the material I have these comments:*

I. Natural Resources: "Air quality will not be significantly impacted" - *fishy* are producing a *Big* fold increase in operations (from 6,000 to 36,000) in one scenario. How can that not impact air quality, water quality, life quality?

II. Community Resources: Mentions "Positive" direct and indirect economic impacts resulting in new operations. Why is no mention made of the negative impacts, direct and indirect, on the economy, quality of life, etc., either on this poster or any other.

III. Your Points of Interest, both in your Draft EIS & your map on your Noise Study (over)

Please print • Additional room is provided on back

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**YOUR INPUT MATTERS**

- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.n. Quality of Life
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.l. Points of Interest
- 6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)
- 7.a. Regional Land Use and Community Character

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Results poster, underestimate sites in Coupeville? Only the elementary school is shown, not the Jr or Sr High. Whidbey Health, the only public hospital on the island, as well as its surgical center was omitted. And it shows NO homes in Coupeville. NONE, people live here, many work here. Tourists flock to Coupeville for its natural beauty and usefulness. They dine in our many restaurants, shop in our stores, hike in our parks and forests, boat in Cow Cove and our waterways. They come to enjoy the agricultural products. They sleep in our hotels, Inns and B&B's. They fall in love with the area and often buy homes and move here. How can that continue ~~to~~ when the OLF operations are slated to increase, as much as sixfold?

IV Why was no mention made of the danger of OLF operations yards away from Hwy 20, the only thoroughfare through the island? More fuel tanks means more danger of distracted or frightened drivers causing accidents.

Thank you.

For more information, please visit the project website at [whidbeyis.com](http://whidbeyis.com)

Please print

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**YOUR INPUT MATTERS**



1.a. Thank You



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To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: **(1) Provide written comments at today's public meeting;** **(2) Speak with the stenographer, who will record your comments;** **(3) Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);** or **(4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]

2. Organization/Affiliation \_\_\_\_\_

3. Address [REDACTED] OAK HARBOR WA 98277

4. E-mail \_\_\_\_\_

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

STRONGLY BELIEVE THAT FLCPS SHOULD BE 80% AT OLF  
AND 20% ADULT FIELD. THIS WILL HELP TRAIN PILOTS & AIRCRAFT IN  
REAL OPERATIONAL CONDITIONS.

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic

6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

1.a. Thank You

2.m. Record of Decision/Preferred Alternative

Memphis, TN 38103

The training aircrew receive at OLF Coupeville is critical to their ability to safely operate in the very unforgiving environment of landing jets on aircraft carriers at night. Disclosures to residences around the OLF identify the noise issues--those who choose to live there do so willingly and fully informed, to claim otherwise is disingenuous. An 80% OLF/20% Ault Filed will provide these brave Americans the proper training they need. It is our moral responsibility to our sons and daughters in harms way doing the tough job and I fully support the EIS.

## Environmental Impact Statement Comment Form

EA-18G Growler Airfield Operations at NAS Whidbey Island Complex

1. **Name** \_\_\_\_\_
2. **Organization/Affiliation** Whidbey Island Nordic Lodge
3. **Address** \_\_\_\_\_  
Coupeville, WA- 98239  
Coupeville, WA- 98239
4. **E-mail** \_\_\_\_\_
5. Please check here  if you would NOT like to be on the mailing list
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**Please Print—additional room is provided on back—Mail to :**  
**Naval Facilities Engineering Command Atlantic**  
**6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS**

I am a member of Whidbey Island Nordic Lodge, a recognized affiliate of the Sons of Norway, a non-profit cultural and community service organization.

With a bequest by a member, a building of approximately 3000 square feet, toilets, and a full commercial-level kitchen was constructed near the intersection of Jacobs Road and Highway 20. We also have an outdoor trail and outdoor game space such as a horseshoe pit. Our activities include speakers on various topics, movies, a book club, a singing group, music programs, banquets, a language study group, craft classes, cooking classes, and presentations by local school students. As anyone who has been present when the OLF is in use can attest, none of these activities can be carried out without stopping all conversation until the jet has left the area. Where flights are not excessive, particularly if announced in advance, our functions can continue. According to

- 1.a. Thank You  
 12.c. Socioeconomic Impacts  
 12.h. Tourism  
 4.l. Points of Interest  
 4.n. Speech Interference (Indoor and Outdoor)  
 4.o. Classroom Learning Interference  
 5.a. Accident Potential Zones

the the Navy's December 2016 guide to the draft EIS, expansion of OLF flights of up to 575% is being proposed. Even if evenly distributed, that would be approximately 675 flights per week. Such a massive expansion would make all of our activities difficult or impossible.

The Lodge building is maintained by renting out the facilities. Our renters have included Yoga and Tai Chi classes, wedding rehearsals and dinners, the Saratoga Symphony, Christian Congregation (monthly—as a church), Dances, the Lions, the Soroptomists, the Whidbey Island Conservation District, Island County Health septic classes, high school reunions, the Girl Scouts, and numerous groups for holiday or fundraiser dinners. All of these renters are subject to noise disruption, and some, such as the Saratoga Symphony, are simply unthinkable under the proposed OLF expansion. The loss of rentals that would likely accompany a massive increase in OLF flights would leave Whidbey Island Nordic Lodge unable to raise funds to maintain our building.

According to the the Navy's draft EIS, pp 3-44 and 4-118, the proposed expansion would put the building in the conceptual APZ1. Besides further eliminating rental income—certainly no County agency is likely to be foolish enough to rent from us in an APZ1 zone— this brings into doubt our ability to obtain insurance, and subjects us and our parent organization, The Sons of Norway, to very substantial potential liabilities. We note that the Navy's own 2013 AICUZ brochure proposes that our building and all of its uses are incompatible with an APZ1 designation.

We ask that when considering the expanded use of the OLF that the Navy recognize that it would likely result in the effective destruction of the Whidbey Island Nordic Lodge.



*Whidbey Island property owners since 1975*

## 1.a. Thank You

Coupeville, WA 98239

I can agree with the fact that the Growlers are noisier than the Prowlers but not to the point of saying the planes must go away. We live directly in the flight loop for OLF and when the planes bounce in a southerly direction the return carries them directly over our house which does give us the noise but like anything else it is gone in a few seconds and as long as you are not exposed to it for prolonged periods I have found it is something that I can easily live with. I also like many found out after buying our property that they really did use OLF but unlike many others it was my fault that I didn't read the disclosure about the airplane noise so I learned to live with it and actually enjoy it when I weighed the benefits of having trained pilots as opposed to having ones that thought they could get back to the carrier deck after they did what they do best and risk their lives every time they fly to protect this country and give the people who complain about it the right to do so. One mans opinion who supports the Navy 110%.

To: EA-18G EIS Project Manager  
Naval Facilities Engineering Command (NAVFAC) Atlantic  
Attn: Code EV21/SS,  
6506 Hampton Blvd.  
Norfolk, VA 23508

From: [REDACTED]  
[REDACTED]  
Coupeville, WA 98239

Dated: 19 February 2017

Re: Comments to the Draft Environmental Impact Statement – EA-18G Growler Airfield Operations

Dear Sirs / Madams,

As a full time nearby resident to the OLF, please accept my comments regarding the Draft EIS proposing a significant increase in the number and duration of practice flights at the field south of Coupeville.

Firstly, I find the description of the "direct, indirect, and cumulative environmental impacts" especially "Scenario A" to be an incredible impact on our lives. The fact that the constraints are specifically tailored to the description of the OLF shows an adoption of the solution without consideration of other viable locations. The number of pages in the EIS makes it appear to me to include a lot of fluff and jargon expecting that just the weight of the document (and the manhours needed to write it) will justify the pre-selected decision without any real study.

The Navy lied to us about how "quieter" the Growler would be and as a result has lost credibility as an honest and fact driven decision making organization. That and the fact that the Navy is the reviewer and approver of the study tells me the Navy is likely lying again when they say "well, we gave everyone a chance to comment" when it appears to me the conclusion was made first, then the study written over and over a great many pages for just justification.

I am very disappointed that "my" Navy has resorted to such flim-flam. There must still be a few honorable and honest people in the Navy and I hope a few are involved in the study. Thank you for reading this and including my comments in the study.

[REDACTED]

- 1.a. Thank You
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 4.k. Comparison of the Prowler to the Growler

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Attn: Code EV21/SS,  
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Norfolk, VA 23508

From: [REDACTED]  
[REDACTED]  
Coupeville, WA 98239

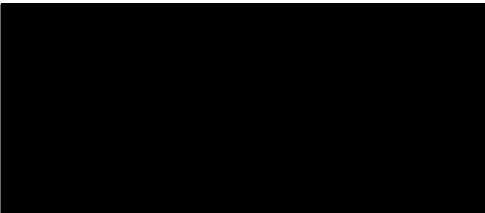
Dated: 19 February 2017

Re: Comments to the Draft Environmental Impact Statement -- EA-18G Growler Airfield Operations

Dear Sirs / Madams,

The expanded use of the OLF to the "80-20%" mix of operation between OLF and Ault field will likely end the good livability now enjoyed by nearby residents. The Coupeville area has become an active and vibrant retirement community and is growing. The depressed prices for land and buildings due to the proximity of OLF make it attractive to homebuyer, only to discover the real price that has to be paid for the noise and risks posed by OLF. The historical museum, library, churches, organizations, schools, and community groups that now create of wonderful mix of old and new culture in the town are threatened with extinction by the noise driving people away. Supporters tell us that OLF has been there since 1942 and we should accept that fact. Coupeville, as the second oldest city in the state founded in 1853, and should have by the same argument - seniority. It is painful to see our community being stressed, our "social fabric torn apart" by supporters and distractors of OLF. I don't buy the argument that a few jobs take priority over livability.

Thank you for reading this and including my comments in the study.



1.a. Thank You  
12.d. Population Impacts  
12.j. Property Values  
12.n. Quality of Life

To: EA-18G EIS Project Manager  
Naval Facilities Engineering Command (NAVFAC) Atlantic  
Attn: Code EV21/SS,  
6506 Hampton Blvd.  
Norfolk, VA 23508

From: [REDACTED]  
[REDACTED]  
Coupeville, WA 98239

Dated: 19 February 2017

Re: Comments to the Draft Environmental Impact Statement – EA-18G Growler Airfield Operations

Dear Sirs / Madams,

I can expect it is difficult for you to process these negative comments to the EIS. After all your bosses wrote it and it must be true and obeyed without question.

However, we unlike many in the Military and even in the Civil Service who are "expected to suck it up" and take their orders, we cannot.

The draft EIS describes an assault on ourselves, our home, our lifestyle, and our cherished values as American patriots. We must insist that the Navy not place so many critical assets in one place that we become the innocent victims of a foreign assault. Recent news articles show that we are an easy target to the incomprehensible government of North Korea. If the Growler is so unique and valued in its capability, basing them all in one place accessible to attack is folly. Where in the EIS is this addressed? Patriot missile batteries, enhanced early detection systems, spread deployment to scattered locations; what is the Navy's plan. Pearl Harbor all over again?

Meanwhile we civilians become sitting ducks because we have this old decrepit and undersized facility in our midst and have to keep quiet and like it.

Not a warm and comfortable situation and hope you agree – send the OLF elsewhere.

Thank you for reading this and including my comments in the study.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 3.a. Aircraft Operations





To: EA-18G EIS Project Manager  
Naval Facilities Engineering Command (NAVFAC) Atlantic  
Attn: Code EV21/SS,  
6506 Hampton Blvd.  
Norfolk, VA 23508

From [REDACTED]  
[REDACTED]  
Coupeville, WA 98239

Dated: 19 February 2017

Re: Comments to the Draft Environmental Impact Statement – EA-18G Growler Airfield Operations

Dear Sirs / Madams,

The possibility of even more Growler operations at OLF brings a real, measurable, and actionable damage to the community in Coupeville and those living around the OLF. This damage is likely to be pursued, as measured and verified by a decrease in real estate and home values in addition to the personal damages suffered by residents. Contaminated water, hearing damage, increased anxiety due to noise, issues with relationships, and stable mental health are all measureable symptoms of the problem. As the population of the Island increases in a need or desire to escape the Seattle-Everett-Tacoma mega urban core, more people are drawn to central Whidbey and for its rural and mostly placid lifestyle. A lifestyle so occasionally rudely interrupted by the Growlers. And it is planned to get even worse.

Agreements signed by homeowners to tolerate the noise were written with an understanding that the jets had limits on their operations. This included sharing the flight paths so one neighborhood did not bear an excess of noise, limits on the hours of operation, posting in the paper when operations would occur so plans to do other inside activities could be made, and evening routes out over the water avoid roof top fly buys. I did not find this in these compromises in the draft EIS.

Why not? Well it seems to me that we are expected to just accept the damages. However in the words of our newly minted Commander in Chief:  
"#SEE YOU IN COURT".

Looking forward to meeting you there,  
[REDACTED]

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act

To: EA-18G EIS Project Manager  
Naval Facilities Engineering Command (NAVFAC) Atlantic  
Attn: Code EV21/SS,  
6506 Hampton Blvd.  
Norfolk, VA 23508

From: [REDACTED]  
[REDACTED]  
Coupeville, WA 98239

Dated: 19 February 2017

Re: Comments to the Draft Environmental Impact Statement – EA-18G Growler Airfield Operations

Dear Sirs / Madams,

I am told the OLF is an inadequate, antiquated, and safety deficient facility as based on the operating parameters for the Growler. The risks to the ever increasing residences built around the OLF are numerous, the most significant is the fact the planes are being operated by "student drivers". The Navy has stated that the carrier landing and takeoffs are the most hazardous time while flying the plane. Yes, they keep a fire truck at the OLF. But when I asked for a copy of the disaster preparedness plan, I was told it was not available and I did not have a "need to know". How can that be when a plane could drop on our home? An inquiry made to our local fire district also went unanswered; I was told not to worry, the Navy would take care of it.

Thank you for reading this and including my comments in the study.

[REDACTED]

- 1.a. Thank You
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 5.a. Accident Potential Zones

To: EA-18G EIS Project Manager  
Naval Facilities Engineering Command (NAVFAC) Atlantic  
Attn: Code EV21/SS,  
6506 Hampton Blvd.  
Norfolk, VA 23508

From: [REDACTED]  
[REDACTED]  
Coupeville, WA 98239

Dated: 19 February 2017

Re: Comments to the Draft Environmental Impact Statement – EA-18G Growler Airfield Operations

Dear Sirs / Madams,

I find it difficult to believe the noise measurements cited in the draft EIS. Why has the Navy not gone out to the field and held up a noise meter and recorded what the real noise levels are. My ears cannot *average* the noise of a Growler flying low enough overhead to "count rivets" when just that one flight deafens me. To me the impact is immediate and cumulative and when the jets fly, all I can do is stand there and take the noise impact. Each flight adds to my misery and there is no way to be satisfied with an *mathematical average* when my ears can ring long after the plane is gone.

The Navy appears to have no problem exposing me to noise levels and durations far in excess to what Navy personnel are allowed to tolerate. How can that be? What about the students in the schools, playfields, and sports facilities around Coupeville. Are they supposed to just *average it out* too?

The whole discussion on noise is at best inaccurate, and at worst another attempt by the Navy to employ "*Alternative Facts*", another way of promoting lies.

Thank you for reading this and including my comments in the study.

[REDACTED]

1.a. Thank You  
4.d. Day-Night Average Sound Level Metric  
4.f. Noise Measurements/Modeling/On-Site Validation  
4.m. Supplemental Metrics

To: EA-18G EIS Project Manager  
Naval Facilities Engineering Command (NAVFAC) Atlantic  
Attn: Code EV21/SS,  
6506 Hampton Blvd.  
Norfolk, VA 23508

From: [REDACTED]  
[REDACTED]  
Coupeville, WA 98239

Dated: 19 February 2017

Re: Comments to the Draft Environmental Impact Statement – EA-18G Growler Airfield  
Operations

Dear Sirs / Madams,

I have to wonder if any of the authors of the study actually went to the OLF and were  
bombarded by the sound of the Growlers doing touch and go landing. Perhaps it is  
more likely they were back in Washington DC, using selective information and old data  
to ignore the real issues surrounding the impact to the community of expanding the use  
of the OLF when it should really be closed down. If the base in Oak Harbor can't handle  
all the planes, then maybe the base need to be moved to someplace where it can have  
the space it needs. That idea was not in the study. Maybe that is because no one else  
wants the Navy in their backyard?

Thank you for reading this and including my comments in the study.

[REDACTED]

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated

To: EA-18G EIS Project Manager  
Naval Facilities Engineering Command (NAVFAC) Atlantic  
Attn: Code EV21/SS,  
6506 Hampton Blvd.  
Norfolk, VA 23508

From [REDACTED]  
[REDACTED]  
Coupeville, WA 98239

Dated: 19 February 2017

Re: Comments to the Draft Environmental Impact Statement – EA-18G Growler Airfield Operations

Dear Sirs / Madams,

By dumping chemical fire suppression chemicals (PFAS) on the ground the Navy may be taking care of their problem of housing encroachment in the time old honored tradition of the American West; poison the wells and they will have to leave. My homeowners association tells me that the chemical dumping problem was known for some time and only recently came to light. I have to wonder if that is just a coincident? I don't think the study addresses the presence of the chemicals in nearby water supplies. One of the wells for the Town of Coupeville has been tested and found to be contaminated with over the acceptable limits for PFAS's. The underground chemical plume may be headed towards a major concentration of housing, Admirals Cove. I believe there is no way to filter PFAS out of the water; it can only be diluted down to tolerable limits. I would suppose that is also true for the human body – like lead and other heavy metals, the level continues to build up with continued exposure to the PFAS chemicals.

The area around Coupeville, as well as the base may become a desert devoid of humans due to the lack of potable water.

Thank you for reading this and including my comments in the study.

[REDACTED]

1.a. Thank You  
11.d. Per- and Polyfluoroalkyl Substances

To: EA-18G EIS Project Manager  
Naval Facilities Engineering Command (NAVFAC) Atlantic  
Attn: Code EV21/SS,  
6506 Hampton Blvd.  
Norfolk, VA 23508

From: [REDACTED]  
[REDACTED]  
Coupeville, WA 98239

Dated: 19 February 2017

Re: Comments to the Draft Environmental Impact Statement – EA-18G Growler Airfield Operations

Dear Sirs / Madams,

The term "nimby" has derisively been applied to local resident who question the Navy. I speak for myself that the OLF jet noise issue has been a real problem and is slated to get much worse over time. Coupeville's sense of community is mocked by those at the north end of the island around the base. They want Coupeville to bear the added noise of more Growlers with little economic benefit. Coupeville as a growing retirement community is not as dependent on the Navy as are the northerners. Navy personnel both active and retired want to live in and around Coupeville to avoid the typical military base culture of "in and out in three years" and little, if any investment in the community. They depend on the retired people and townfolks who join the clubs, churches, and organizations that build a rich and stable culture so missing in Oak Harbor.

The plan to add even more Growlers to OLF threatens Coupeville and the EIS offers no help in offsetting the noise, pollution, and danger from the jets. Coupeville would benefit most if OLF were closed and the growlers sent elsewhere; anywhere but here.

Thank you for reading this and including my comments in the study.

[REDACTED]

1.a. Thank You  
12.n. Quality of Life  
12.p. Local Differences in Economy

To: EA-18G EIS Project Manager  
Naval Facilities Engineering Command (NAVFAC) Atlantic  
Attn: Code EV21/SS,  
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Norfolk, VA 23508

From: [REDACTED]  
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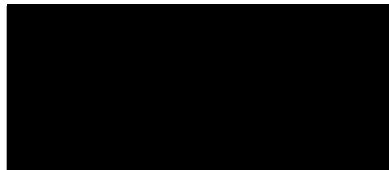
Dear Sirs / Madams,

Are the results of the study already in; a foregone consideration? Since the Navy developed the basing plan, wrote the EIS rules, hired the consultants they wanted, did any new studies they thought would support, wrote the study results, and yet again, then gets to be the reviewer and then grade it as pass/fail. Where do the men and women of integrity and honor get involved? There does not appear a credible thinker involved on the Navy's side? Recent comments by members of the Island County government made in refusing to share in money's rightfully belonging to Coupeville shows political hardball being practiced to shut down any opposition to the plan. The Navy has not been truthful with the Coupeville in the past. So far there has been no apparent change in tactics.

I don't think the Navy has a plan to really address the problems bringing more jets to Whidbey. Problems with the school's ability in learning, maintaining local quality of life, expectation of current residence preservation of home values under the added onslaught are the big issues being ignored by the study and must be addressed.

Thank you for reading this and including my comments in the study.

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 12.p. Local Differences in Economy
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 4.o. Classroom Learning Interference



Coupeville, WA 98239

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC)  
Atlantic Attn: Code EV21/SS, 6506 Hampton Blvd. Norfolk, VA 23508 From: [REDACTED]  
[REDACTED] Coupeville, WA 98239 Dated: 19 February 2017 Re:  
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- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 4.k. Comparison of the Prowler to the Growler



Coupeville, WA 98239

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Coupeville, WA 98239

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- 1.b. Best Available Science and Data
- 12.p. Local Differences in Economy
- 2.b. Scope of the Environmental Impact Statement and Analysis  
Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 4.o. Classroom Learning Interference

Coupeville, WA 98239

1.a. Thank You  
12.n. Quality of Life  
12.p. Local Differences in Economy

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC)  
Atlantic Attn: Code EV21/SS, 6506 Hampton Blvd. Norfolk, VA 23508 From: [REDACTED]  
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To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC)  
Atlantic Attn: Code EV21/SS, 6506 Hampton Blvd. Norfolk, VA 23508 From: [REDACTED]  
[REDACTED] Coupeville, WA 98239 Dated: 19 February 2017 Re:  
Comments to the Draft Environmental Impact Statement – EA-18G Growler Airfield  
Operations Dear Sirs / Madams, The possibility of even more Growler operations at OLF  
brings a real, measurable, and actionable damage to the community in Coupeville and  
those living around the OLF. This damage is likely to be pursued, as measured and  
verified by a decrease in real estate and home values in addition to the personal  
damages suffered by residents. Contaminated water, hearing damage, increased anxiety  
due to noise, issues with relationships, and stable mental health are all measureable  
symptoms of the problem. As the population of the Island increases in a need or desire to  
escape the Seattle-Everett-Tacoma mega urban core, more people are drawn to central  
Whidbey and for its rural and mostly placid lifestyle. A lifestyle so occasionally rudely  
interrupted by the Growlers. And it is planned to get even worse. Agreements signed by  
homeowners to tolerate the noise were written with an understanding that the jets had  
limits on their operations. This included sharing the flight paths so one neighborhood did  
not bear an excess of noise, limits on the hours of operation, posting in the paper when  
operations would occur so plans to do other inside activities could be made, and evening  
routes out over the water avoid roof top fly buys. I did not find this in these compromises  
in the draft EIS. Why not? Well it seems to me that we are expected to just accept the  
damages. However in the words of our newly minted Commander in Chief: "#SEE YOU  
IN COURT". Looking forward to meeting you there,

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 2.b. Scope of the Environmental Impact Statement and Analysis  
Conducted
- 2.c. Compliance with the National Environmental Policy Act

Coupeville, WA 98239

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC)  
Atlantic Attn: Code EV21/SS, 6506 Hampton Blvd. Norfolk, VA 23508 From: [REDACTED]  
[REDACTED] Coupeville, WA 98239 Dated: 19 February 2017 Re:  
Comments to the Draft Environmental Impact Statement – EA-18G Growler Airfield  
Operations Dear Sirs / Madams, I can expect it is difficult for you to process these  
negative comments to the EIS. After all your bosses wrote it and it must be true and  
obeyed without question. However, we unlike many in the Military and even in the Civil  
Service who are “expected to suck it up” and take their orders, we cannot. The draft EIS  
describes an assault on ourselves, our home, our lifestyle, and our cherished values as  
American patriots. We must insist that the Navy not place so many critical assets in one  
place that we become the innocent victims of a foreign assault. Recent news articles  
show that we are an easy target to the incomprehensible government of North Korea. If  
the Growler is so unique and valued in its capability, basing them all in one place  
accessible to attack is folly. Where in the EIS is this addressed? Patriot missile batteries,  
enhanced early detection systems, spread deployment to scattered locations; what is the  
Navy’s plan. Pearl Harbor all over again? Meanwhile we civilians become sitting ducks  
because we have this old decrepit and undersized facility in our midst and have to keep  
quiet and like it. Not a warm and comfortable situation and hope you agree – send the  
OLF elsewhere. Thank you for reading this and including my comments in the study.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 3.a. Aircraft Operations

Coupeville, WA 98239

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC)  
Atlantic Attn: Code EV21/SS, 6506 Hampton Blvd. Norfolk, VA 23508 From: [REDACTED]  
[REDACTED] Coupeville, WA 98239 Dated: 19 February 2017 Re:  
Comments to the Draft Environmental Impact Statement – EA-18G Growler Airfield  
Operations Dear Sirs / Madams, I have to wonder if any of the authors of the study  
actually went to the OLF and were bombarded by the sound of the Growlers doing touch  
and go landing. Perhaps it is more likely they were back in Washington DC, using  
selective information and old data to ignore the real issues surrounding the impact to the  
community of expanding the use of the OLF when it should really be closed down. If the  
base in Oak Harbor can't handle all the planes, then maybe the base need to be moved  
to someplace where it can have the space it needs. That idea was not in the study.  
Maybe that is because no one else wants the Navy in their backyard? Thank you for  
reading this and including my comments in the study.

Coupeville, WA 98239

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC)  
Atlantic Attn: Code EV21/SS, 6506 Hampton Blvd. Norfolk, VA 23508 From: [REDACTED]  
[REDACTED] Coupeville, WA 98239 Dated: 19 February 2017 Re:  
Comments to the Draft Environmental Impact Statement – EA-18G Growler Airfield  
Operations Dear Sirs / Madams, I am told the OLF is an inadequate, antiquated, and  
safety deficient facility as based on the operating parameters for the Growler. The risks to  
the ever increasing residences built around the OLF are numerous, the most significant is  
the fact the planes are being operated by “student drivers”. The Navy has stated that the  
carrier landing and takeoffs are the most hazardous time while flying the plane. Yes, they  
keep a fire truck at the OLF. But when I asked for a copy of the disaster preparedness  
plan, I was told it was not available and I did not have a “need to know”. How can that be  
when a plane could drop on our home? An inquiry made to our local fire district also went  
unanswered; I was told not to worry, the Navy would take care of it. Thank you for  
reading this and including my comments in the study.

- 1.a. Thank You
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study  
Requests
- 5.a. Accident Potential Zones

1.a. Thank You  
11.d. Per- and Polyfluoroalkyl Substances

Coupeville, WA 98239

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC)  
Atlantic Attn: Code EV21/SS, 6506 Hampton Blvd. Norfolk, VA 23508 From: [REDACTED]  
[REDACTED] Coupeville, WA 98239 Dated: 19 February 2017 Re:  
Comments to the Draft Environmental Impact Statement – EA-18G Growler Airfield  
Operations Dear Sirs / Madams, By dumping chemical fire suppression chemicals  
(PFAS) on the ground the Navy may be taking care of their problem of housing  
encroachment in the time old honored tradition of the American West; poison the wells  
and they will have to leave. My homeowners association tells me that the chemical  
dumping problem was known for some time and only recently came to light. I have to  
wonder if that is just a coincident? I don't think the study addresses the presence of the  
chemicals in nearby water supplies. One of the wells for the Town of Coupeville has been  
tested and found to be contaminated with over the acceptable limits for PFAS's. The  
underground chemical plume may be headed towards a major concentration of housing,  
Admirals Cove. I believe there is no way to filter PFAS out of the water; it can only be  
diluted down to tolerable limits. I would suppose that is also true for the human body –  
like lead and other heavy metals, the level continues to build up with continued exposure  
to the PFAS chemicals. The area around Coupeville, as well as the base may become a  
desert devoid of humans due to the lack of potable water. Thank you for reading this and  
including my comments in the study.



Coupeville, WA 98239

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC)  
Atlantic Attn: Code EV21/SS, 6506 Hampton Blvd. Norfolk, VA 23508 From: [REDACTED]  
[REDACTED] Coupeville, WA 98239 Dated: 19 February 2017 Re:  
Comments to the Draft Environmental Impact Statement – EA-18G Growler Airfield  
Operations Dear Sirs / Madams, The expanded use of the OLF to the “80-20%” mix of  
operation between OLF and Ault field will likely end the good livability now enjoyed by  
nearby residents. The Coupeville area has become an active and vibrant retirement  
community and is growing. The depressed prices for land and buildings due to the  
proximity of OLF make it attractive to homebuyer, only to discover the real price that has  
to be paid for the noise and risks posed by OLF. The historical museum, library,  
churches, organizations, schools, and community groups that now create of wonderful  
mix of old and new culture in the town are threatened with extinction by the noise driving  
people away. Supporters tell us that OLF has been there since 1942 and we should  
accept that fact. Coupeville, as the second oldest city in the state founded in 1853, and  
should have by the same argument - seniority. It is painful to see our community being  
stressed, our “social fabric torn apart” by supporters and distractors of OLF. I don’t buy  
the argument that a few jobs take priority over livability. Thank you for reading this and  
including my comments in the study.

1.a. Thank You  
12.d. Population Impacts  
12.j. Property Values  
12.n. Quality of Life

Coupeville, WA 98239

1.a. Thank You

1.d. General Project Concerns

I've lived between Coupeville and OLF since 2000 (active duty 2000 to 2003) and have not had a problem with the 6,000 or so FCLPs per year. After all, I knew about the flights when I bought my house. However, increasing those flights up to 6-fold (or even 2-fold) was not part of the bargain. I will fight this.

Victoria, British Columbia V8S 2E2

1.a. Thank You  
4.q. Potential Hearing Loss

We are seniors with poor hearing (I wear aids), and we find the constant noise trying. We did not hear the jets until recent months, so would appreciate modification that reduces the steady roar.

January 6, 2017

EA-18G EIS Project Manager  
 Naval Facilities Engineering Command (NAVFAC) Atlantic  
 Attn: Code EV21/SS  
 6506 Hampton Blvd.  
 Norfolk, VA 23508

Re: Public Comment Against Draft EIS for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island

Dear Sir/Madam:

I am a resident of Clallam County Washington. I am extremely concerned about the effects of noise generated by the Electronic Attack Squadron (VAQ) 132 over the Olympic National Park and surrounding areas including populated areas. Every effort should be made to mitigate the noise to prevent injury to habitat for humans and other animals. I understand that there is no need for the pilots to be at an elevation (other than for landing and take-off) lower than ten-thousand feet, but pilots have been well below this elevation numerous times as evidenced by the flight records kept by the Whidbey NAS and by many complaints received by NAS Whidbey. Can you find a way to assure citizens that flights will not be lower than the ten-thousand foot level?

I also understand that a similar aircraft practices in Mountain Home Idaho AFB, home of the 366 Airforce wing. In fact, the 390th Electronic Combat Squadron, which I believe includes the Electronic Attack Squadron, located at Naval Air Station Whidbey Island, Wash., is assigned to the 366th Operations Group out of Mountain Home AFB. Is the duplication of such training facilities necessary?

I am sure you are aware of the December 16, 2016 incident at NAS Whidbey. The US Navy (USN) has grounded its fleet of Boeing F/A-18E/F Super Hornet and EA-18G Growler combat aircraft while it investigates the cause of a ground incident on 16 December that injured two flight-crew.

The incident at Naval Air Station (NAS) Whidbey Island in Washington state saw an EA-18G Growler from Electronic Attack Squadron (VAQ) 132 experience an unspecified "on-deck emergency" that required both crew members to be airlifted to hospital, a USN statement said.

The Olympic National Park is a National Heritage site, and citizens on the Olympic Peninsula deserve reasonable noise mitigation. I strongly urge appropriate, affective noise mitigation and high altitude only flights which the current draft EIS does not adequately address or resolve.

Sincerely,

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Port Angeles 98360

cc: Hon. Derek Kilmer, U.S. Congressman, 6<sup>th</sup> CD, WA State

- 1.a. Thank You
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.a. Purpose and Need
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 4.l. Points of Interest
- 4.t. Noise Mitigation
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children

**Draft Environmental Impact Statement Comment Form**  
**EA-18G Growler Airfield Operations at NAS Whidbey Island Complex**

Comments must be postmarked or submitted online by February 24, 2017

Online at: <http://www.whidbeyeis.com/Comment.aspx>

By mail at: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
*Resident*

3. Address \_\_\_\_\_, *Coupeville, VA 98239*

4. Email \_\_\_\_\_

*Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.*

**Comments**

Please check all that concern you and include additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.d. Population Impacts
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.

Noise impacts on commercial properties including agriculture.

**Additional Concerns:**

- Risk of increased aquifer and well contamination.
- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife such as orcas and migratory birds.
- The major terrorist risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as the Growler onboard oxygen system.

**Please include any additional comments and concerns here:**

I have lived within 1 mile of the OLF for nearly 20 years. I can tolerate 6,000 flights per year & understand that the pilots need to practice. But more flights than this would be intolerable, would impact the property value of my home, & would cause me to have to relocate. I am 76 years old & do not want to have to do this! Thank you for your consideration.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

For more information, go to **Coupeville Community Allies**, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler EIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.

**Environmental Impact Statement Comment Form**  
**EA-18G Growler Airfield Operations at NAS Whidbey Island Complex**

Comments must be postmarked or submitted online by February 24, 2017

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
 \_\_\_\_\_  
*citizen, property owner*

3. Address \_\_\_\_\_  
 \_\_\_\_\_  
*Coupeville, VA 98239*

4. Email \_\_\_\_\_

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

**Comments**

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.d. Population Impacts
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.j. Impacts on Outdoor Sports

- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

I am very concerned that my property values will be impacted by increased flights. In fact, I'm sure they will be. Also, the noise is terrific & can only be sustained so often & for so long, nothing like the Navy's DEIS proposal.

Thank you for paying attention to our citizens concerns. They are serious & sincere. — [REDACTED]

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

**For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)**

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.



Environmental Impact Statement Comment Form  
EA-18G Growler Airfield Operations at NAS Whidbey Island Complex

Comments must be postmarked or submitted online by February 24, 2017  
SEND COPIES OF YOUR COMMENTS TO OUR ELECTED OFFICIALS

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
By mail at: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

1. Name [Redacted]  
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
*Citizen*  
3. Address [Redacted] *Coupeville WA 98239*  
4. Email [Redacted]

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

Comments

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area. *disturbed by noise*
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

All the growlers should not be sited here. And for those that are, surely they can find places to practice that will not completely disrupt the quality of life on Whidbey Island.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

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Freeland, WA 98249

1.a. Thank You

Keep the jets! I ? jet noise! My Husband and I used to live at Squire road and loved to see the jets fly over! That is the sound of FREEDOM!!

God Bless our Military!!

Coupeville, WA 98239

1.a. Thank You  
12.f. Economic Hardship and Impacts

It will be very difficult to hold meetings and to rent our facilities, as we do now, with 5-day/week, several hours per day, jet noise, especially if 80% of the flights use the OLF.

Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to: EA-18G EIS Project Manager NAVFAC Atlantic Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508

- 1.a. Thank You
12.a. Socioeconomic Study Area
12.h. Tourism
2.c. Compliance with the National Environmental Policy Act
2.e. Public Involvement Process
2.k. Range of Alternatives
2.n. Alternatives Considered But Eliminated
4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
4.c. Advanced Acoustic Model
4.d. Day-Night Average Sound Level Metric
4.f. Noise Measurements/Modeling/On-Site Validation
4.g. Average Annual Day/Average Busy Day Noise Levels
4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
4.j. Other Reports
4.r. Nonauditory Health Effects
4.t. Noise Mitigation
7.h. San Juan Islands National Monument

1. First Name [Redacted]
2. Last Name [Redacted]
3. Organization/Affiliation Lopez Island Resident
4. City, State, ZIP Lopez Island Wa 98261
5. E-mail [Redacted]
6. Please check here [ ] if you would NOT like to be on the mailing list
7. Please check here [ ] if you would like your name/address kept private

## Draft Environmental Impact Statement for EA-18G “Growler” Airfield Operations at Naval Air Station Whidbey Island Complex

### January, 2017 Comments

Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.  
**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**
2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.  
**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**
3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide “scientifically and legally defensible noise assessments” of the modern, high-thrust jet engines used in the Growlers.  
**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**
4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.  
**Action: Noise levels should only be averaged over active flying days.**
5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.  
**Action: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**
6. The Draft includes some independent noise measurements and ignores others.  
**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**

- 7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

- 8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

- 9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

- 10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

- 11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states “If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.”

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

- 12. Add your own comments here:

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Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:  
EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

1. First Name \_\_\_\_\_  
2. Last Name \_\_\_\_\_  
3. Organization/Affiliation \_\_\_\_\_  
4. City, State, ZIP Lopez Island, WA 98261  
5. E-mail \_\_\_\_\_

6. Please check here  if you would NOT like to be on the mailing list

7. Please check here  if you would like your name/address kept private

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument



## Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

### January, 2017 Comments

*Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)*

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.  
**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**
2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.  
**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**
3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.  
**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**
4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.  
**Action: Noise levels should only be averaged over active flying days.**
5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.  
**Action: Recognize the health impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**
6. The Draft includes some independent noise measurements and ignores others.  
**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**

7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion."

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

12. Add your own comments here:

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# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) *Provide written comments at today's public meeting;* (2) *Speak with the stenographer, who will record your comments;* (3) *Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);* or (4) *Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.*

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name

2. Organization/Affiliation None

3. Address

4. E-mail

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

I am a former naval officer and I understand the need for training BUT the expansion of activity in this region is high by inappropriate. Already there is too much disruption of lives in the area caused by the current high level of activity over the top, along with exceed the levels suggested by the EIS. Pilots will always "push the envelope" - they have done it many times in our area causing disturbing sound levels in an otherwise peaceful area. This project should be moved elsewhere.

Please print • Additional room is provided on back  
 Please drop this form into one of the comment boxes here at the public meeting or mail to:  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 2.k. Range of Alternatives
- 4.d. Day-Night Average Sound Level Metric

1.a. Thank You

Port Townsend, WA 98368

I'm opposed to the use of any part of WA state for navy jet training. The noise and attitude is offensive.

1.a. Thank You  
4.r. Nonauditory Health Effects

IN THE MATTER OF:  
The Open House Public Meeting for the Draft Environmental  
Impact Statement (EIS) for EA-18G "Growler" Airfield  
Operations at Naval Air Station (NAS) Whidbey Island Complex

DATE TAKEN: Friday, December 9, 2016

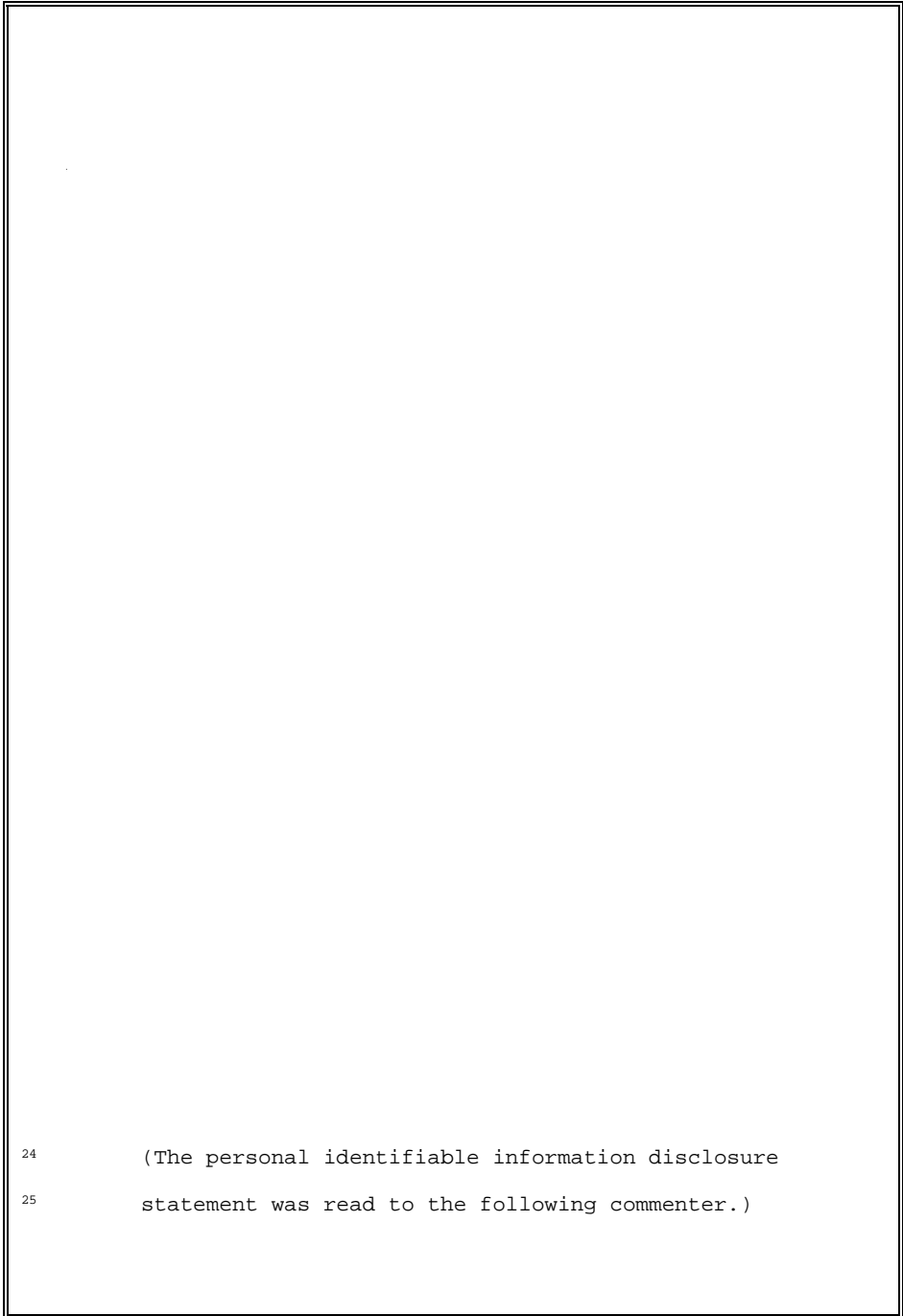
PLACE: Coupeville High School  
501 South Main Street  
Commons  
Coupeville, Washington

TIME: 4:00 p.m. to 7:00 p.m.

REPORTED BY: Mary Mejlaender, CCR No. 2056  
Likkell & Associates  
Court Reporters & Legal Video  
2722 Colby Avenue  
Suite 706  
Everett, WA 98201  
depos@likkellcourtreporters.com

LIKKEL & ASSOCIATES, COURT REPORTERS & LEGAL VIDEO  
2722 Colby Avenue, Suite 706, Everett, WA, 98201

(425) 259-3330



24 (The personal identifiable information disclosure  
25 statement was read to the following commenter.)

1 MS. [REDACTED]: Yes, you read the comment to  
2 me. And my name is [REDACTED], and I live in  
3 Coupeville, Washington down in Admirals Cove.

4 Back in 2009 I started having seizures and I went  
5 into the hospital. I was in about four days and they found  
6 out that I also had seizure disorder and multiple sclerosis.  
7 And so it's been a journey for me and it has been a real  
8 test on my family with my having this, both disorders. And  
9 when the planes fly there's an accelerated health issue that  
10 I have with MS. It bothers the MS. It bothers my nerve  
11 endings. And so I take my medication religiously every day.  
12 It helps, but when the planes fly over and they're loud it  
13 really takes it up a couple of notches where the medicine  
14 doesn't help.

15 So I would -- I would -- you know, I would love  
16 for the Navy to find a cure for MS so I can stay in my  
17 house, and I would -- I would really like it for the  
18 neighbors that are boohooing and saying that I should move  
19 and it's too bad for me that I don't like the noise, it's  
20 not because I don't like the noise. It's because my health  
21 suffers from the noise of the jets.

22 And yes, I did know there was a base, a landing  
23 field, when my husband and I moved there back in 1996. I  
24 was not aware at the time that I had MS or that I was going  
25 to be suffering from complications of MS, and now I'm kind

1 of stuck in a neighborhood that has extra noise that didn't  
2 bother me before other than just being a problem with  
3 turning the T.V. up or turning it down, but now it's a  
4 health issue for me. And it involves heightened issues with  
5 my nerves, with my general health, with having to take extra  
6 medication. And so maybe just a little bit of concern, a  
7 little bit of compassion, a little bit of we're sorry that  
8 it's too loud but here's some earmuffs, you know. So -- and  
9 that's where I'm at on it.

10 \* \* \*



Vashon, WA 98070

I am concerned about multiple deficiencies in the USN Growler Electronic Warfare Proposal Environmental Impact Statement. 1) Wildlife impacts - noise. Inadequate noise profiles of the USN Growler and insufficient or erroneous assessments of wildlife impacts due to noise (feeding / mating interruptions, damage to hearing much more sensitive to humans) must be properly evaluated. 2) Wildlife impacts – collision. The low altitude flight profiles of the USN Growler significantly increases aircraft / bird collision. Endangered species, like the Marbled Murrelet, frequently transit the proposed Electronic Warfare practice area. Lack of altitude separation will create more bird deaths. This specific species is in decline more than 4% per year. The full impact of deaths due to airborne collision must be taken into consideration. 3) Economic harm to rural western Washington communities. Our rural western Washington communities are already under severe economic stress. Past timber over-harvest has reduced the resource extraction based economy. Tourism and recreation represent opportunities for economic viability. This is not possible when noise from USN Growler overflights is present. Hiking, car camping, hunting, fishing, lodging and climbing are all negatively affected. These communities need economic support, not further economic distress. A comprehensive, accurate and balanced Environmental Impact assessment of this project must be done. This has not been accomplished to date. Thank you, [REDACTED], Vashon, Wa 98070 [REDACTED]

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.f. Endangered Species Impact Analysis Adequacy
- 10.k. Aircraft-Wildlife Strike and Hazing/Lethal Control of Wildlife
- 12.h. Tourism
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act

Coupeville, WA 98239

1.a. Thank You  
3.d. Arrivals and Departures

We protest about flying the shoreline.

coupeville, WA 98239

The amount of jets you want to add and the increased noise from latest generation of jets is too much!!! It's over the top! Sometimes flying til midnight? It's silly. Move the base to a more isolated area or keep the flights in Oak Harbor, where folks don't seem to mind the added noise. The noise was acceptable with the previous jets, but not these. Bases do close you know! Go see Camp Casey or Ft. Worden. Times and conditions change and it would be great if you all could change along with them. I listened to the jets before i purchased my property in 1998 and they did not keep me awake at night...The present generation of growlers DOES keep me awake and they have a bigger flight pattern too. Take the jets to an area where they will be appreciated or to a low/no populated area.

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 4.k. Comparison of the Prowler to the Growler
- 4.p. Sleep Disturbance

coupeville, WA 98239

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- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
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coupeville, WA 98239

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- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 4.k. Comparison of the Prowler to the Growler
- 4.p. Sleep Disturbance

Coupeville, WA 98239

1.a. Thank You

2.n. Alternatives Considered But Eliminated

When I moved to Coupeville in 1998, the jet noise was acceptable. The new generation of Growlers is NOT acceptable and are too loud. At times, they fly til almost midnight and now more are on the way. Please fly them where they are appreciated (not in Coupeville) or where there is not a large population. I would prefer to not have to move, because of unacceptably loud jet noise.

Port Townsend, WA 98368

To whom it may concern, Please do not go forward with the plan to add more growler jets to the base on Whidbey Island, WA and do not allow electromagnetic operations in the Olympic National Forest. There are much better places to do this kind of training that will not affect so many people so badly as it does in the Puget Sound area. The current DEIS whose information is being used to promote these issues has not addressed many of public's concerns brought up during the previous comment periods: proper measurement of noise levels of the growler jets, growth and impact of noise levels, mental and physical health impact on citizens in the area, especially on Whidbey Island, and impact on wildlife in the area, especially in the Olympic National Forest. Thank you for your consideration of my concerns, [REDACTED]

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 2.I. No Action Alternative
- 4.a. General Noise Modeling
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Port Townsend, WA 98368

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments

Please give the public an extra 45 days to comment on the Navy's acquisition of 36 more Growler jets. This is a very difficult time of year for people to easily comment and this is an issue that needs fair consideration by everyone.



Vashon, WA 98070

I am concerned about multiple deficiencies in the USN Growler Electronic Warfare Proposal Environmental Impact Statement. 1) Wildlife impacts - noise. Inadequate noise profiles of the USN Growler and insufficient or erroneous assessments of wildlife impacts due to noise (feeding / mating interruptions, damage to hearing much more sensitive to humans) must be properly evaluated. 2) Wildlife impacts – collision. The low altitude flight profiles of the USN Growler significantly increases aircraft / bird collision. Endangered species, like the Marbled Murrelet, frequently transit the proposed Electronic Warfare practice area. Lack of altitude separation will create more bird deaths. This specific species is in decline more than 4% per year. The full impact of deaths due to airborne collision must be taken into consideration. 3) Economic harm to rural western Washington communities. Our rural western Washington communities are already under severe economic stress. Past timber over-harvest has reduced the resource extraction based economy. Tourism and recreation represent opportunities for economic viability. This is not possible when noise from USN Growler overflights is present. Hiking, car camping, hunting, fishing, lodging and climbing are all negatively affected. These communities need economic support, not further economic distress. A comprehensive, accurate and balanced Environmental Impact assessment of this project must be done. This has not been accomplished to date. Thank you, [REDACTED] PO Box [REDACTED], Vashon, Wa 98070 [REDACTED]

- 1.a. Thank You
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.e. A-Weighted Noise Analysis and Scale of Hearing on Wildlife
- 10.f. Endangered Species Impact Analysis Adequacy
- 10.k. Aircraft-Wildlife Strike and Hazing/Lethal Control of Wildlife
- 12.h. Tourism
- 7.e. Impacts to Recreation from Noise/Operations

Clinton, WA 98236

1.a. Thank You  
11.d. Per- and Polyfluoroalkyl Substances  
2.n. Alternatives Considered But Eliminated

Q1 - why not consider 'consolidating' prowler operations somewhere else, if growlers operations have to be consolidated here on whidbey. If consolidation cost savings is reason for growler expansion - why not alleviate some of our local burden by consolidating prowler operations at another prowler location? Q2 - Navy never bothered to clean up Lake Hancock, a huge loss of beautiful wetlands to central whidbey that nobody can use or enjoy now. Why should we believe they will mitigate the CURRENT and future pollution to ground water due to operations in coupeville? please notify me of any future developments on plans for an increase in navy operations on whidbey island. thank you

LYNNWOOD, WA 98037

The DEIS misrepresents the impacts of Growler noise. No measurements of noise were taken in communities. Instead, the Navy used computer modeling that averaged periods of noise with long period of silence. The DEIS ignores overwhelming scientific and medical evidence of harms caused by hazardous Growler noise. It presents no evidence that those harms are not now occurring and will not occur in the future ALL of the alternatives for Growler operations proposed by the Navy will create more noise and harms in communities throughout the Puget Sound. The DEIS's alternatives only shift the burden of harms between communities

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.r. Nonauditory Health Effects

Clinton, WA 98236-8814

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments

Requiring the citizenry to submit comments (regarding the Navy's Draft Environmental Impact Statement to add 36 more Growlers to NASWI) during the busiest time of the year, in terms of holidays and family time together, is unfair and does not allow a thoughtful and accurate response. We therefore request a 45-day timeline extensions regarding the EIS. We believe these activities will severely harm the environment, animals, and humans, and that the citizenry should have an appropriate amount of time to comment. , go to:

<https://cara.ecosystem-management.org/Public/CommentInput?Project=42759>

<http://www.whidbeyeis.com/Comment.aspx>.

Clinton, WA 98236-8814

The Navy's DEIS ignores the harmful consequences of Growler operations taking place. It does not address the true environmental and public health consequences of planned Growler increases. The DEIS is flawed by design and prepared in violation of the National Environmental Policy Act. The Navy should relocate touch-and-go Growler training from Whidbey Island to another less populated and environmentally sensitive location. We are reviewing the DEIS and will prepare additional, detailed comments to the Navy. In the meantime, given the business of the holiday season and the need to focus on our families, we ask that the Navy extend the DEISA comment-period by 45 days. So far, the following are a few observations: - The DEIS misrepresents the impacts of Growler noise. No measurements of noise were taken in communities. Instead, the Navy used computer modeling that averaged periods of noise with long period of silence. - The DEIS ignores overwhelming scientific and medical evidence of harms caused by hazardous Growler noise. It presents no evidence that those harms are not now occurring and will not occur in the future - ALL of the alternatives for Growler operations proposed by the Navy will create more noise and harms in communities throughout the Puget Sound. The DEIS's alternatives only shift the burden of harms between communities.

- 1.a. Thank You
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.r. Nonauditory Health Effects

Oak Harbor, WA 98277

1.a. Thank You  
12.c. Socioeconomic Impacts  
12.i. Community Service Impacts

The outstanding protection afforded by the EA-18G is in exceedingly high demand. We need more in all operating areas. It (plus the EA-6B "Prowler") has a perfect record of safeguarding aircraft in combat. During recent conflicts, close collaboration with ground troops and Whidbey aircrew, saved many, many lives. NASWI provides 1,200,000,000 dollars in economic impact to Island County. This is the equivalent of a Fortune 500 company in our community. NASWI is the largest employer in Northwest Washington. Comprehensive and objective studies show the Growler is not noisier than the Prowler. -- New jet, new sound. There are no documented health concerns at other bases which have hosted the same engines, with much higher population densities, after more than a decade of operations. The Growler and the entire F-18 Hornet family of aircraft have outstanding safety records. Despite claims to the contrary, both Deception Pass and Olympic National Park remain some of the highest visited areas of Washington, even after decades of jet operations in their vicinity. (Note, 2016 was Olympic National Park's sixth busiest year.) OLF provides almost ideal conditions for carrier landing practice due to low light and sea-level proximity. It has played a very large role in carrier landing risk reduction, for NASWI aircraft. NASWI and OLF have been here for 75 years. OLF has conducted jet landing practice for 50 years. Whidbey Island benefits by countless hours of community service performed by Navy personnel. NASWI Search and Rescue (SAR) provides incomparable value to Washington State, much of which cannot be shouldered by other agencies. Small opposition groups are present around many military installations; they have waxed and waned through the years on Whidbey Island.

Port Townsend, WA 98368

I object to increased Growler Airfield Operations, the impact on our community and on our wildlife is unacceptable. Tourism and natural beauty is why we live here in this remarkable place, the increased presence will impact both. In addition, I am concerned about use of chemicals that have impacted the water of Island residents.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.h. Tourism
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Coupeville, WA 98239

Whidbey Island NAS OLF EIS Comments 12/8/16 I am writing this letter as a strong supporter of the Navy and it's continued and safe use of the OLF. I neither challenge the necessity of the Navy's OLF flight training program nor its importance in safeguarding our national security. I have lived on my 60-acre farm directly under the flight path for the last 12 years and have ample personal experience with the respective noise levels of the EA-18 Growler as well as the EA-6B. I understand that the Navy has determined that the jet noise near the OLF "is within the threshold of safe operations." Furthermore, this determination has been made using a sophisticated noise assessment & modeling program that utilizes the very best acoustic science available. I am certainly not qualified to pass judgment on the Navy's methodology, but I am qualified to report my personal experience and that of many other strong supporters of the US Navy. I find the noise to be intolerable and at times even painful. In my opinion, when the EA-6B's were flying, the noise and the frequency of the flights created an unpleasant situation, however, I never found it to be intolerable or to generate extreme annoyance. The notion that the Navy actually believes that a time weighted average noise level would ameliorate deafening peak noise is absolutely disingenuous. It is not only completely counterintuitive but also insulting. I would far prefer that the Navy simply tell the truth and say: this is what we are going do, and nothing you say will change it. If this were done, no matter how much I would dislike this stance, at least it would be worthy of the US Navy as it would be truthful. Thank you for the opportunity to comment on this matter. [REDACTED]

[REDACTED] Coupeville, Wa. 98239

1.a. Thank You

2.h. Next Steps

4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources

4.c. Advanced Acoustic Model

4.d. Day-Night Average Sound Level Metric



## Whidbey Island NAS - Comments on the DEIS 12/9/16

I am writing this letter as a strong supporter of the Navy and it's continued and safe use of the OLF. I neither challenge the necessity of the Navy's OLF flight training program nor its importance in safeguarding our national security. I have lived on my 60-acre farm directly under the flight path for the last 11 years and have ample personal experience with the respective noise levels of the EA-18 Growler as well as the EA-6B. I am however, challenging the various scenarios contained in the EIS that would increase the jet traffic over the OLF.


I understand that the Navy has determined that the jet noise near the OLF "is within the threshold of safe operations." Furthermore, this determination has been made using a sophisticated computer generated noise assessment & modeling program that utilizes the very best acoustic science available. I am certainly not qualified to pass judgment on the Navy's methodology, but I am qualified to report my personal experience and that of many of my neighbors who are strong supporters of the US Navy. I find the noise to be intolerable and frequently even painful. In my opinion, when the EA-6B's were flying, the noise and the frequency of the flights created an unpleasant situation, however, I never found it to be intolerable or to generate extreme annoyance. I am absolutely convinced that any conclusion that denies this "so called subjective experience", even if based on accepted scientific theory, is simply incorrect. Why? Because it defies direct human cognition and logic.

The notion that the Navy actually believes that a time weighted average noise level would ameliorate deafening peak noise is absolutely disingenuous. It is not only completely counterintuitive but also insulting. I would far prefer that the Navy be honorable and simply tell the truth. Say something like: **Based upon our view of the necessity of this program, this is what we are going do, and nothing you say or do will change it.** If this were done, no matter how much I would dislike this stance, at least it would be worthy of the US Navy, as it would be truthful and not shaded by some hypothetical formulae of dubious relevance. This, of course would be unacceptable, but at least, would be comprehensible to those who must move from their homes, without the ability to sell their property at a reasonable price, or who are unable to find buyers at any price. It is highly unlikely that prospective buyers would say, "I am willing to endure the hardship of deafening noise, based on the formula for the maximum allowable time of exposure at the forecast noise level:  $t = 480 / 2(L - 85)/3$  (1)

Without regard for the merits of the Navy's proposed program, the actual effect will be a significant deterioration of our lifestyle as well as our property values. At the end of the day, the government is essentially exercising its right of eminent domain, (the taking of private property) and in effect condemning our property. This in turn should trigger the government's legal obligation to provide landowners fair compensation.

In light of this and numerous other specific arguments against the proposed program, an alternative position would be to generate a DEIS that weights human experience and community impacts at least as heavily as the Day-Night/Annual Average Sound Level or some other theoretical metrics. I would suggest that a hybrid evaluation system be employed, with some measures that are objective and others that are subjective. This would include an analysis of numerous other potential damages that could occur. It would, of course, also acknowledge the necessity that real time measurement acoustic decibel levels be made. This will serve Navy as well as the community in making a fair determination on how to best move forward with this important program.

Thank you for the opportunity to comment on this matter.

 Coupeville, WA. 98239

- 1.a. Thank You
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.m. Supplemental Metrics

[REDACTED]  
 [REDACTED]  
 Port Townsend, WA 98368  
 February 9, 2017

EA-18G EIS Project Manager  
 Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: codeEV21/SS 6506  
 Hampton Blvd.  
 Norfolk, VA 23508

Sirs:

A look at the Economist Magazine's Pocket World in Figures (2016, p102) tells us that the US spent \$596.9bn on arms in 2014: latest figures. This is more than the next highest nine nations, combined. What's more, the US **exported** arms in the amount of \$10,194m, which is more than the next three highest nations, combined.

I always believed the grade-school claim that the USA was a peaceful nation. But the above figures suggest that maybe this is not so. I do believe that we should spend enough to have a reasonable defense system. In support of this, I willingly served in the military.

To have adequate military is one thing, but to have a defense budget like ours is over the top. To me, the excess of our military is demonstrated right here in Port Townsend. I understand that the Navy has a designated operational area within reach, but still insists on flying over communities, practicing military maneuvers in parklands, and generally disrupting civilian life in our area.

I am reminded of a time I was on a bus in Mexico. We got pulled over at a road-block, and three heavily-armed soldiers came on the bus. They walked slowly down the aisle, staring at each person, one-by-one. I was really scared.

The not-ignorable roar of a growler going overhead is just another form of military intrusion into our lives. Is this over-reaction? We need to be careful.

I ask that the growlers practice maneuvers in a place other than the Olympic Peninsula, that the growler activity be diverted as much as possible from our communities. Furthermore, I suggest that we have enough growlers. Let's not add more.

[REDACTED]  
 Port Townsend, WA

Review items organized by category are provided below:

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.a. Purpose and Need
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 8.a. Cultural Resources Area of Potential Effect
- 8.b. Section 106 Process
- 8.c. Noise and Vibration Impacts to Cultural Resources

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To: EA-18G EIS Project Manager  
Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506  
Hampton Blvd.  
Norfolk, VA 23508

Dear Sir/Madam,

Thank you for extending the comment period to February 24, 2017, in order to accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way.

**1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant.** Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because *all* flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects.

**2. Impacts to cultural and historic sites are not adequately considered.** The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA).

**3. Piecemealing projects to avoid analyzing cumulative effects is illegal.** The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions:

1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft;
2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers);
3. 2012 EA (26 Growlers including 5 from a reserve unit);
4. 2014 EA (Growler electronic warfare activity);
5. 2015 EIS discussing electronic warfare training and testing activity;
6. The current 2016-2017 DEIS (36 Growlers);
7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160.

Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville *alone* went from 3,200 per year to a proposed 35,100 in 2017. That’s more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are “no significant impacts.” The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) “...does not allow an approach that would permit dividing a project into multiple ‘actions,’ each of which individually has an insignificant environmental impact, but which collectively have a substantial impact.”

The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability.

**4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam** on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water.

**5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation** in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential

impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is “turning out fully trained, combat-ready Electronic Attack crews.”

**6. The current comment period on a Draft EIS should not be the last chance** the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The “30-day waiting period” proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts.

**7. There are no alternatives proposed in this DEIS that would reduce noise.** This violates NEPA §1506.1, which states, “. . .no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives.” According to a memo from the President’s Council on Environmental Quality (CEQ) to all federal agencies, “Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.” (<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the “loser” among these communities.

**8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative** in the DEIS. According to the CEQ memo, “[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to “identify the agency’s preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . .” Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative.

**9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010** with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are “tiered” for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and

training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula.

**10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise** in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the “Affected Noise Environment” around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy’s ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas.

**11. The Navy’s claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect**, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the “library” of sounds that comprise the basis for the Navy’s computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS that wildlife are “presumably habituated” to noise do not apply when that noise is sporadic and intense.

**12. Commercial airport noise standards should not apply to military jets** because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy’s benefit, but does not benefit the public.

**13. The Navy's noise analysis does not allow for peak noise experiences,** nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers.

**14. The NOISEMAP software used for computer modeling is severely outdated,** and a report from a Department of Defense commission concluded that noise measurements using this software "...do not properly account for the complex operational and noise characteristics of the new aircraft." This report concluded that current computer models could be legally indefensible. (<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>)

**15. The Navy describes its activities using the term "event," but does not define it.** Therefore, the time, duration, and number of jets in a single "event" remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public's ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them.

**16. New information that was not disclosed** in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service's draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with "...opening day and associated opening weekend of Washington State's Big Game Hunting Season for use of rifle/guns." While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control.

**17. Low flights will make even more noise than before:** While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: "Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL." This guidance further states, "Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure." If this official guidance directs Growlers to fly at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed.

**18. Sound levels for these low flights are not listed in the DEIS:** Table 3.1-2, titled “Representative Sound Levels for Growler Aircraft in Level Flight,” on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets.

**19. No mitigation for schools:** The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, “...but may be developed and altered based on comments received.” Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be “...identified in the Final EIS or Record of Decision.” Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy’s proposal to *not* allow a comment period on the Final EIS would be unlawful.

**20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information** about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period.

**21. Crash potential is higher:** With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable.

**22. Contamination of drinking water** in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, “No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft.” While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can



claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant.

**23. Navy knew about contamination in advance:** It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls “historic” use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health advisories for two PFCs, and the Navy announced in June that it was in the process of “identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam].” Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: “Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e).” The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word “perfluoroalkyl” or “PFAS” is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>)

**24. No mention of contaminated soil is found in the DEIS:** It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water.

**25. Impacts to wildlife have been piecemealed:** It does not make sense to separate impacts from just one portion of an aircraft’s flight operations and say that’s all you’re looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy’s study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual “events,”

which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted.

**26. Pages of boilerplate language do not constitute analysis of impacts to wildlife:**

Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly *likely* that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area.

**27. Old research cited but new research not:** In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB. (<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called “Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,” (<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the *best available science*. This DEIS fails that test.

Thank you for considering these comments.  
Sincerely,

Coupeville, WA 98239

I'm a home health nurse on Whidbey Island and my territory encompasses the entire island. I see patients that are homebound, some are bedbound and never leave their home. I am the eyes and ears for their doctors. I need to assess and recommend treatment to their doctors (who rarely see them). I live in Central Whidbey. When the jets fly it is impossible for me to be outside my home and even inside my home I must wear ear plugs AND noise reduction headsets. It is impossible to carry on a conversation and it is impossible to sleep. I chose Whidbey Island because of the beauty and as an outdoorswoman appreciate the opportunities to fish, hike, and mountain bike. To be an effective nurse I need to care for myself by recharging with sleep and outdoor activities. I bought my home in a peaceful place (they jets were taking a 6 month break when I bought) with a beautiful view. When the jets started flying I couldn't believe how loud it was. I lived on the east side of the island for 18 years so I thought I understood what it would be like when they flew. It turns out it's much louder on the West side. I was shocked and have been reminded that the navy was flying prior to my home purchase which is true. I cannot withstand the deafening sound to be more frequent. I cannot think clearly after the noise, I cannot talk over it, and I cannot sleep through it. This doesn't just affect me, my son, dog, and neighbors. This affects ALL the patients I see and the report their PCP gets from me. Missing important signs and symptoms can literally cost a patient their life. Please understand this decision ripples throughout the island as sound travels, it permeates all aspects of quality of life.

- 1.a. Thank You
- 12.n. Quality of Life
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 7.d. Recreation and Wilderness Analysis and Study Area

Port Angeles, WA 98362

Allowing outrageously loud machines to fly over or even within earshot of Olympic National Park is reprehensible and unacceptable. To claim that there is little or no effect on wildlife and human population here is simply Trump-like denial. An increase in noise will not be tolerated. The only reasonable alternative is NO FLIGHTS over the Olympic Peninsula.

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.I. No Action Alternative
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.d. Recreation and Wilderness Analysis and Study Area



# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) *Provide written comments at today's public meeting;* (2) *Speak with the stenographer, who will record your comments;* (3) *Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);* or (4) *Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.*

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]

2. Organization/Affiliation Lopez Citizen

3. Address [REDACTED], Lopez I

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

1) I do not believe any of the Alternatives are substantially different. All essentially double existing flights to 40,000 flights. I'd love to see an alternative plan like fewer flights than existing or at least an alternative plan for 30,000 flights. Having three Alternatives that are essentially the same is not a choice. This is frustrating because it says there is no alternative why create the illusion?

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 12.n. Quality of Life
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.d. Day-Night Average Sound Level Metric
- 4.r. Nonauditory Health Effects

All comments must be received by January 25, 2017. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

2) the noise level of a growler exceeds 140 dba and a jet flying over exceeds 85 dba. I think you should study the effects of this noise level even over a short time period. It seems your threshold of 85 dba over 8hrs over 5 days is too high to have a meaningful discussion about health effects. I believe there are health consequences to the noise levels I experience here on Lopez I. You should study this.

3) I complain about growler noise because it affects my enjoyment of life here on Lopez Island. I support the Navy in the mission to keep our world and country safe, but I disagree on the best way to do this. This jet noise is already significant so doubling the number of flights should be studied carefully. Opening a second base in another place is a great compromise and if this is not economically feasible then ~~that~~ I would say current operations should be declared unfeasible and all operations should shut down. I disagree that moving this many flights cannot be shared by two bases.

For more information, please visit the project website at [whidbeyeis.com](http://whidbeyeis.com)

Please print

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

1002650.0041.10

Whidbey 2016\_Comment Sheet al-GRA-6/23/16

## 1.a. Thank You

Oak Harbor, WA 98277

After watching what happened to Lemoore NAS when the expansion was completed I would have to say no to the expansion. There is no fishing in any of the little streams and rivers. The amount of criminal activity from family members of sailors has increased. Drunk driving and distracted driving accidents and death as well as fighting, loud music, disrespect to authorities have increased. Oak Harbor still has a family feel. You can still ride your bike to work. You can relax without loud music and sirens all day long. You know your neighbor's and the people are still happy and friendly. Please don't let Oak Harbor become another Lemoore, Ca. BTW Housing prices decreased and U don't think we want that for Oak Harbor.

## 1.a. Thank You

Freeland, WA 98249

Thank you for providing the extremely professional and well prepared EIS and for this opportunity to comment. The time, effort and cost invested in this EIS is significant but the resulting facts and data rich documentation will provide value long into the future. From your introductory 4 bullet points to your final appendix data point you have provided the community with objective information of the highest quality. As one of the 609 Island County citizens already on your email distribution list you should know that the vast majority of citizens strongly support Naval Aviation and value your contributions to this County and the Nation as a whole. Citizens strongly support all four of your stated objectives: continuing and expanding existing operations; increasing electronic attack operations and capabilities; conducting construction and renovation projects; employing additional technical and professional personnel. The thorough presentation of facts and data around several possible scenarios under consideration results in an EIS that anticipates and answers numerous legitimate community concerns while at the same time deflating numerous less-than -honest activist contentions. Trying to meet your deadline I reviewed the on-line documentation and then went to the Freeland library to view the two-volume hard copy. On the way a Coast Guard helicopter raced over head; then an executive jet flew by on approach to Paine field; then in the distance a Boeing transporter took off for Japan and more 787 parts...all the wonderful sounds of American freedom. I reviewed the documents and believe I was the first person to ask for them and crack them open; too bad for they are very well produced. On the way home from the roughly ten mile distance came the sound of carrier landing practice at OLF; that sound quickly overpowered by the neighbors lawn service leaf blower...and that leads to this conclusion: Thank you for the quality EIS and detailed scenario based information. Thank you for this opportunity to comment. Buy the aircraft; increase operations; add more personnel; increase EA capabilities; increase training; launch the construction and renovation projects; the vast majority of Island County supports you!! Thank you for all that you do to keep America free and make America great again. [REDACTED], WA



Freeland, WA 98249

- 1.a. Thank You
- 2.a. Purpose and Need
- 2.k. Range of Alternatives

You are asking people under the flight path to allow an astronomical increase in Growler jet noise. How can you justify this? Would you please reconsider the number of Growlers flying over our heads constantly? Please reduce the number of Growlers. The noise reduces tourism, the ability of homeowners to sell their properties and the quality of life for people here on Whidbey Island and in the San Juans.

Seattle, WA 98115

We have a home in Coupeville, and therefore we have concerns to your efforts. Alternatives 1. No alternatives to Whidbey Island were considered. The reasons given for not reviewing off-island alternatives - a 40-year history, travel distance, expense - are merely mentioned, not given a serious, hard look. The 1,500-page draft fails to show that there are not more suitable locations than Whidbey. There are no comments regarding the suitability of locations such as NAS Fallon, Nevada. 2. The DEIS also does not address a potential national security threat. It says nothing about why our country should have all its electronic attack equipment in one location. Especially on an island that is: 1) susceptible to terrorist attack because it is only accessible by bridge or ferry; and 2) in an area of the country susceptible to earthquake and tsunami. Noise 1. Actual noise measurements were not made by the Navy, only modeled by computer. The model used 365 days/year to arrive at the average daily decibel level instead of the actual non-weekend number of flying days flown per year - making the decibel level appear lower than it actually is. 2. Actual measurements by residents have recorded levels as high as 130 decibels during flyovers - far above the 80 dB that the DEIS indicates potentially cause hearing loss. 3. The effects of flyover noise on Coupeville Elementary students are not adequately addressed and the effects on students at the Middle and High schools are not addressed at all. Economic Impact 1. Coupeville's economy is highly dependent on tourism and small-farm agriculture - a potential increase to 35,100 operations from 6,100 will likely cripple Coupeville's tourism trade as well as residents' property values. 2. The DEIS does not refer to the effect on Coupeville's biggest draw - Ebey's Landing National Historical Reserve. There is no reference to the National Park Service's 2015 noise study, which measured two different points in Ebey's Reserve over a 30-day period. One representative 24-hour period cited in the NPS study recorded 281 "military aircraft events" that exceeded 70 dBA - 10 dBA over the limit deemed to interrupt speech by visitors. Public Safety 1. The DEIS does not adequately address the potential for increased accidents in the potential six-fold increase in flights at the OLF. Pilots are trainees learning new, dangerous maneuvers, increasing accident risk above routine flights done by seasoned pilots. Accidents result in the use of fire-fighting foams with chemicals that have contaminated private and public drinking water wells near OLF. 2. The EPA's Health Advisory Levels for two of these chemicals - PFOA and PFOS - is 70 parts per trillion (PPT). The Navy is currently testing wells for three chemicals, PFOA, PFOS and PFBS - all of which the EPA lists as likely human carcinogens. So far, 10% of wells tested are above EPA limits - one as high as 440 PPT. These banned toxins are still being stored on Whidbey for emergency use and increased flight operations will increase the risk of accidents, fires and the need to use the foams. Summary We are not anti-Navy. And we definitely support the need to train our pilots. But we don't think it's reasonable to put our nation's entire electronic warfare in one location (Whidbey). Nor do we think it's fair to increase one small town's burden from 6,100 operations each year to a potential 35,100. We encourage the Navy to find other expansion alternatives to Coupeville.

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 2.k. Range of Alternatives
- 3.a. Aircraft Operations
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

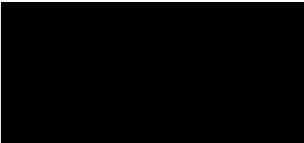
Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

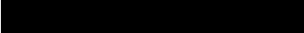
Fill in and mail with comments to:

EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

1. First Name



2. Last Name



3. Organization/Affiliation

4. City, State, ZIP

HOPEZ ISLAND, WA 98261

5. E-mail



6. Please check here  if you would NOT like to be on the mailing list

7. Please check here  if you would like your name/address kept private

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 12.j. Property Values
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.h. San Juan Islands National Monument

**Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex**

**January, 2017 Comments**

*Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)*

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.  
**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**
2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.  
**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**
3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.  
**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**
4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.  
**Action: Noise levels should only be averaged over active flying days.**
5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.  
**Action: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**
6. The Draft includes some independent noise measurements and ignores others.  
**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**

- 7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

- 8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

- 9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

- 10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

- 11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion."

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

- 12. Add your own comments here:

YOU ARE PUTTING MY FAMILY'S  
HEALTH AT RISK. MOVE THE  
GROWLERS TO THE DESERT!

Camano Island, WA 98223

I respectfully would like to submit my complaint about the noise from the EA-18G Growlers. I live on the north end of Camano Island and at times, the noise is unbearable. The noise is so loud you can not hear someone talking inside our house with double pane windows shut. If we are outside we are forced to go inside it is so loud. Though looking at the flight plan, north Camano Island is not on the plan. There are late night flights which keep us awake for hours on end. Why can't these very loud planes be flown over eastern WA where it is not populated? There is so much empty land in our country where they can practice, not to mention the risk of one of these jets crashing. I also object to what these planes do to our environment and the animals. The EA-18G has a noise signature with elevated low frequencies. It is claimed that repeated exposure to high sound levels at these frequencies is detrimental to long term health according to the AMA and World Health Organization. The US Navy calculates that its current rate of mishaps is 1.27 class A mishaps per 100,000 flight hours, averaged from 2002 to 2016 for all aircraft. I am a proud American who values what the Navy does for us, but at what point do the risk outweigh needs? When citizens are suffering isn't it the Navy's obligation to protect us by not causing us harm? Thank you for allowing me to post my concerns.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 2.n. Alternatives Considered But Eliminated
- 4.l. Points of Interest
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children



# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) *Provide written comments at today's public meeting;* (2) *Speak with the stenographer, who will record your comments;* (3) *Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);* or (4) *Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.*

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

- 1. Name [REDACTED]
- 2. Organization/Affiliation QUUE, KPTZ, PTSANGHA, PLANETEARTH
- 3. Address [REDACTED] PT WA 98368
- 4. E-mail [REDACTED]
- 5. Please check here  if you would NOT like to be on the mailing list
- 6. Please check here  if you would like to receive a CD of the Final EIS when available

Dear Navy,

when we go to the Olympic Rainforest, we know that you have lied. Noise and chemicals will destroy the chain of life in our fragile treasure, the last of our treasure of this kind.

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.d. Recreation and Wilderness Analysis and Study Area

Please print - Additional room is provided on back  
 Please drop this form into one of the comment boxes here at the public meeting or mail to:  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

Coupeville, WA 98239

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. Increasing OLF operations to up to 35,000 per year (135 flight operations daily) ,will dramatically increase the residential and commercial areas impacted by noise. This is a burden greater than the Coupeville/Central Whidbey community can bear. Increased operations at OLF risk greater aquifer and well contamination. Wells near OLF have now found to be contaminated with toxic PFOA compounds from Navy firefighting foam which the Navy continues to use for aircraft fires. In 2016 over 10% of all private wells tested were found contaminated above the EPA standard . The extent of contamination has not been determined nor have results been shared with the community. There is no mitigation plan in place. The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values. The Navy did not adequately look at siting new Growler aircraft elsewhere. Coupeville classrooms will be interrupted up to 5 times per hour, or every 12 minutes. Please don't harm those you've sworn to protect.

1.a. Thank You  
11.d. Per- and Polyfluoroalkyl Substances  
12.e. Agriculture Analysis  
12.h. Tourism  
12.j. Property Values  
12.m. Education Impacts  
12.n. Quality of Life  
2.k. Range of Alternatives  
2.n. Alternatives Considered But Eliminated  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects  
5.a. Accident Potential Zones  
7.b. Land Use Compatibility and Air Installations Compatible Use Zones



1.a. Thank You  
19.d. Electronic Warfare

Port Townsend, WA 98368

I am deeply disturbed that the Draft EIS makes no mention of the emission of electromagnetic radiation nor its concomitant health effects. Experimental evidence has shown that exposure to low intensity radiation can have a profound effect on biological processes. Cited are increased risks of childhood leukemia, brain tumors, genotoxic effects, neurological effects and neurodegenerative diseases, immune system deregulation, allergic and inflammatory responses, breast cancer, miscarriage and some cardiovascular effects. Do we really want to protect our country at the expense of the health of its citizens?

1.a. Thank You  
19.d. Electronic Warfare

Port Townsend, WA 98368

Electromagnetic radiation's impact on wildlife is very well documented, as thousands of peer-reviewed scientific studies have been published on the topic. In May 2014, a study titled "Electromagnetic Interference Disrupts Bird Navigation, Hints at Quantum Action" was published in the journal Nature. "Researchers found out that very weak electromagnetic fields disrupt the magnetic compass used by European robins and other songbirds to navigate using the Earth's magnetic field," according to the study. That same month another study, "Sensory biology: Radio waves zap the biomagnetic compass," was also published in Nature. "Weak radio waves in the medium-wave band are sufficient to disrupt geomagnetic orientation in migratory birds, according to a particularly well-controlled study," Nature reports. It added, "Interference from electronics . . . can disrupt the internal magnetic compasses of migratory birds." According to the Admiralty Audubon Society, the Pacific Coast is part of the Pacific Flyway, which makes it a critical pathway for migratory birds, with an estimated 1 billion birds migrating along the flyway annually. In the colloquial sense, an increase in growler activity is "for the birds."

Port Townsend, WA 98368

The Draft EIS claims the increased noise produced by an up-tick in Growler activity will have "No Significant Impact" on humans. This is a fallacy. Hearing loss, sleep disruption, difficulty with speech comprehension, disruption of indoor and outdoor events, and interference with classroom aren't simply inconvenient. They are life-changers. Your analysis is flawed. The annual Day-Night Noise Level are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance. Your conclusions are skewed.

1.a. Thank You

12.n. Quality of Life

4.d. Day-Night Average Sound Level Metric

4.g. Average Annual Day/Average Busy Day Noise Levels

4.r. Nonauditory Health Effects

Port Townsend, WA 98368

1.a. Thank You

4.r. Nonauditory Health Effects

Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature.

Port Townsend, WA 98368

1.a. Thank You

4.q. Potential Hearing Loss

The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined "hazardous noise zone" threshold (i.e., an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month).

Port Townsend, WA 98368

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states, "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and reanalyzed.

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

LAngley, WA 98260

The DEIS claim that the JGL noise study was “flawed” is disingenuous and unsupported, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data. 4. The DEIS misconstrued important finding of the National Park Service’s 2015 noise study at Ebey’s Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconstruct has to be credibly revised to properly characterize the real impacts. 5. Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature. 6. The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy’s defined hazardous noise zone threshold (i.e., “an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month”). 7. Island County land-use policies, plans, as reflected by the construction permits issued, have largely defied the Navy’s 2005 AICUZ directives for Outlying Field Coupeville, such as no residences in a noise zone 2. Whether due to willful intent to ignore by the County or to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and attendant land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should be immediately advocating to the County to place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved. 8. The two most dangerous aspects of flying are the approach, landing and takeoff -- in other words most of the OLFC flight path. The risks are significant (a) because of significant encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes with the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs off a suitable 21st century off-Whidbey site. 9. Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise. 10. Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of these wells. Leakage of PFAS in storage or use in a crash event is a hugely relevant environmental impact must be addressed and the public must be given the opportunity to comment. 11. The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 13.a. Environmental Justice Impacts
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.e. Field Carrier Landing Practice Patterns
- 3.f. Field Carrier Landing Practice Operation Totals
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.d. Day-Night Average Sound Level Metric
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children
- 7.c. Noise Disclosure

operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% overestimated use of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected. 12. The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the "percent probability of awakening for all scenarios..." While music torture is still permitted under US law, the United National Convention against Torture defines torture as "any act by which severe pain of suffering, whether physical or mental..." Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations. 13. The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and analyzed. 14. The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated. 15. The DEIS fails to adequately address the effects of high noise levels during pregnancy provoking significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.

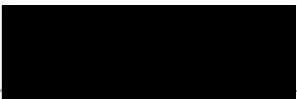


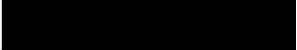
Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:


EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

1. First Name 

2. Last Name 

3. Organization/Affiliation Resident

4. City, State, ZIP Lopez Island, WA 98261

5. E-mail 

6. Please check here  if you would NOT like to be on the mailing list
7. Please check here  if you would like your name/address kept private

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
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- 2.c. Compliance with the National Environmental Policy Act
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Operations at Naval Air Station Whidbey Island Complex**

**January, 2017 Comments**

*Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)*

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**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**

2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.

**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**

3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.

**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**

4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.

**Action: Noise levels should only be averaged over active flying days.**

5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.

**Action: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**

6. The Draft includes some independent noise measurements and ignores others.

**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**

7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion."

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

12. Add your own comments here:

I am the daughter of a Navy Captain pilot and grew up attending many airshows. I appreciate the military. I also lived on Lopez Island more than 20 years ago when there was no noise from Growlers. Although I have accepted the current level of noise as again a resident here, I cringe to think of it increasing almost 50%. I just returned from travel + found many flights were happening after dark – the sense that you can't get away from them. Please reconsider the well being of your adjacent citizens + marine life as well as your scal  
 01/08/16 [www.QuietSkies.info](http://www.QuietSkies.info) to protect us.

Thank you

, WA 98106

1.a. Thank You

18.a. Climate Change and Greenhouse Gases

19.d. Electronic Warfare

"War games" over the Olympic Peninsula is completely unacceptable. Unimaginable!  
This is a place of peace and beauty for humans and wildlife. Not to mention these war  
games adding so much CO2 to the atmosphere. Criminal! STOP!

Seattle, WA 98122

NO WAR GAMES ON THE OLYMPIC PENINSULA!! Not only should these remain truly public recreational lands, but from a climate perspective, each jet burns 1304 gallons PER HOUR and produces 12.5 metric tons of CO2 per hour! Just for perspective that is 23% more than the ANNUAL CO2 emissions of a WA state citizen! (Then multiply by up to 118 jets x 260 days a year 14-16 hours a day, at altitudes as low as 1000 feet) This is outrageous that to practice war we would destroy the beautiful peninsula and our planet! Our planet c

- 1.a. Thank You
- 18.b. Average Carbon Dioxide per Aircraft
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare

Clinton, WA 98236

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP).

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

Clinton, WA 98236

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.g. Average Annual Day/Average Busy Day Noise Levels

Clinton, WA 98236

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather than busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports



Clinton, WA 98236

1.a. Thank You  
4.j. Other Reports

The DEIS misconstrued important finding of the National Park Service's 2015 noise study at Ebey's Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconstruct has to be credibly revised to properly characterize the real impacts.

Clinton, WA 98236

1.a. Thank You

4.r. Nonauditory Health Effects

Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature.

Clinton, WA 98236

1.a. Thank You  
4.q. Potential Hearing Loss

The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined hazardous noise zone threshold (i.e., "an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month").

Clinton, WA 98236

1.a. Thank You  
7.c. Noise Disclosure

Island County land-use policies, plans, as reflected by the construction permits issued, have largely defied the Navy's 2005 AICUZ directives for Outlying Field Coupeville, such as no residences in a noise zone 2. Whether due to willful intent to ignore by the County or to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and attendant land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should be immediately advocating to the County to place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved.

Clinton, WA 98236

The two most dangerous aspects of flying are the approach, landing and takeoff -- in other words most of the OLFC flight path. The risks are significant (a) because of significant encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes with the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs off a suitable 21st century off-Whidbey site.

- 1.a. Thank You
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

Clinton, WA 98236

1.a. Thank You

13.a. Environmental Justice Impacts

Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise.

Clinton, WA 98236

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of these wells. Leakage of PFAS in storage or use in a crash event is a hugely relevant environmental impact must be addressed and the public must be given the opportunity to comment.

Clinton, WA 98236

The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% overestimated use of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

- 1.a. Thank You
- 3.e. Field Carrier Landing Practice Patterns
- 3.f. Field Carrier Landing Practice Operation Totals
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo



Clinton, WA 98236

1.a. Thank You  
4.p. Sleep Disturbance  
4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the "percent probability of awakening for all scenarios..." While music torture is still permitted under US law, the United National Convention against Torture defines torture as "any act by which severe pain of suffering, whether physical or mental..." Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations.

Clinton, WA 98236

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and analyzed.

1.a. Thank You  
4.o. Classroom Learning Interference  
4.r. Nonauditory Health Effects

Clinton, WA 98236

1.a. Thank You  
4.q. Potential Hearing Loss

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

Clinton, WA 98236

1.a. Thank You

4.r. Nonauditory Health Effects

The DEIS fails to adequately address the effects of high noise levels during pregnancy provoking significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.

**Environmental Impact Statement Comment Form**  
**EA-18G Growler Airfield Operations at NAS Whidbey Island Complex**

**Comments must be postmarked or submitted online by February 24, 2017**  
**SEND COPIES OF YOUR COMMENTS TO OUR ELECTED OFFICIALS**

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
By mail at *Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS*

1. Name [REDACTED] \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
 \_\_\_\_\_

3. Address [REDACTED] *resident* Coupeville Wa 98239

4. Email \_\_\_\_\_

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

**Comments**

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquafer and well contamination.

**Additional Concerns:**

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

I have significant concerns with the expansion of the growlers @ NAS Whidbey + its impacts on our health + wellness of our community.

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

**For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)**

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.

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Online at: <http://www.whidbeyeis.com/Comment.aspx>  
By mail at: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA  
23508, Attn: Code EV21/SS

1. Name [Redacted]  
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
    *resident*  
3. Address [Redacted] *Coupeville*  
4. Email *lwr 98239*

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

Comments

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(over)

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- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

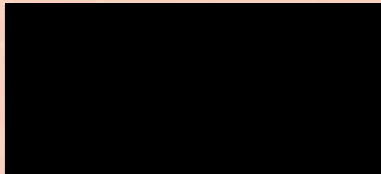
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- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

**Please include any additional comments and concerns here:**

I have great concerns over the safety of our health with the growler expansion.



All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

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Coupeville, WA 98239

Effect of Accident Potential Zones (APZ) at OLF are not sufficiently evaluated. Section 4.3.2.1 in the DEIS describes conceptual APZ's at OLF Coupeville. Yearly operations at the OLF were below 5000 at the time of the 2005 AICUZ study, and APZ's were unwarranted at the time. However, annual operations have exceeded 5000 since 2009. Any scenario (even no action) will require the Navy recommend establishing APZ's at OLF Coupeville. • The EIS should describe in detail the consequences of establishing APZ's at the OLF including: lowering of property values; restriction of property and development rights; accident potential risk for people, homes, businesses, and institutions located under APZ's; loss in property taxes to Island County and the Town of Coupeville; and the potential loss of business and economic consequences for businesses in and around the OLF. • Actual, binding APZ's should be drawn for each scenario described in the EIS. Homeowners, businesses, tax-supported agencies, elected representatives, realtors, planners, farmers, and other stakeholders all deserve to know what to expect.

1.a. Thank You  
12.k. Compensation to Citizens for Private Property  
12.n. Quality of Life  
5.a. Accident Potential Zones

1.a. Thank You

7.d. Recreation and Wilderness Analysis and Study Area

Coupeville, WA 98239

Outdoor Recreation impacts of the proposal are not addressed adequately in the DEIS. Whidbey Island quality of life and tourism is highly tied to outdoor recreation. Increased Growler operations will significantly impact recreation. The EIS should address the following:

- Activities: Outdoor competitive sports (school and other), walking, hiking, running, fishing, hunting, camping, road bicycling, mountain biking, kayaking, bird watching, historical tours, dog walking, picnicking, beach combing, gardening, swimming.
- Locations: Schools; sporting fields, tracks, etc; State Parks, County Parks, City Parks; Ebey's Landing National Historical Reserve; Kettles Trail system, off-Leash dog parks, private community swimming pools, wildlife viewing areas (such as Crockett Lake & Keystone Spit); rural road networks, residences.

Coupeville, WA 98239

1.a. Thank You  
6.f. Fuel Dumping

The frequency, quantity, and effects of fuel dumping from Growler operations are not addressed in the DEIS.

Coupeville, WA 98239

Expected crash frequency, risk analysis, and accident potential of crashes of the Growler is not addressed adequately in the DEIS. Environmental impacts resulting from a crash are not addressed. There are well-documented crashes in the Growler, and its sister aircraft the Hornet, that can be used to estimate the expected frequency of mishaps. The statement in section 4.3.2.1 that "While it is generally difficult to project future safety/mishap rates...the Growler has a well-documented and established safety record..." is subjective and wholly inadequate. The EIS should include detailed crash risk analysis including for the following: Sole-source drinking water aquifers, homes, businesses, schools, hospital, County and City governments, Island Transit center, County Solid waste facility, disruption to emergency response agencies (Sheriff, hospital, EMS), weather conditions and BASH hazard. The crash risk assessment should include factors specific for the expected mission at NASWI, such as: training new pilots, night operation, the OLF being 2,600 feet short of Navy regulation, the proximity of State Highway and County Roads to the OLF.

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

5.a. Accident Potential Zones

5.d. Environmental Health Risks and Safety Risks to Children

5.e. Lack of First Responders at Outlying Landing Field Coupeville

Coupeville, WA 98239

Noise modeling used in DEIS is not appropriate for and representative of noise made by Growlers. • DoD's Strategic Environmental Research and Development Program (SERDP) found NOISEMAP ver 7.2 to be outdated and possibly not able to provide "legally defensible aircraft noise assessments of current and future aircraft operations". The modeling program was developed to assess civilian airport noise. The noise evaluation model used in the EIS should be appropriate to evaluate Growler noise on the surrounding community. • The Naval Research Advisory Committee has acknowledged that variations in noise from tactical aircraft measurement standards are not addressed in standards for commercial aircraft, and that there are no standards for acquiring near-field aircraft noise data. The EIS evaluation should account for variations in noise measured from Growlers compared to commercial aircraft. • Noise averaging (Ldn) is inappropriate for Growler FCLP flights at OLF Coupeville, which occur sporadically. Studies by Borsky(a) and Stephens(b) show that maximum dBA readings are better indicators of community annoyance than Ldn. Generally frequent maximum sounds of 70 dBA or greater correlate in a linear fashion with community annoyance. The Coupeville community regularly experiences maximum noise exceeding 90 dBA, often exceeding 100 dBA, near and around the OLF flight path. The EIS should show maximum noise contours based on this metric. • The noise model and DEIS doesn't sufficiently assess the physical and mental harm, annoyance, disturbance to life and business, childhood learning, economy, tourism from noise. • Actual noise measurements have not been made by the Navy. Actual peak noise measurements should be made for the EIS, at several more POI's than identified in the DEIS. Individual sound measurements made by the National Park Service and others in the Central Whidbey community show noise levels far in excess of that predicted by DEIS modeling. • OSHA maximum noise exposure limits are 110 dB for 30 min per day, or 115 dB for 15 min per day (slow response). Growler FCLP operations at the OLF have been measured exceeding these sound levels at several locations, including my home and adjacent business, and at Rhododendron Park. Thus, the proposed action may exceed OSHA guidelines. The EIS should evaluate noise exposure based on OSHA guidelines, and state that OSHA noise exposure limits may be exceeded. • Washington State law (WAC 296-817-20025) requires that employers in the State post warning signs in areas where noise levels will exceed 115 dB. The EIS should state that the Navy will make public notice, and request local jurisdictions to post warning signs, in public areas where noise levels exceed 115 dB. (a) Borsky, PN: Integration of Multiple Aircraft Noise Exposure Over time by Residents Living Near US Air Force Bases, in Noise as a Public Health Problem, Proceeding of the 4th International Congress, Giovanni Rossi, MD, editor, Milano, Italy, Volume II, pp. 1049-1060, 1983. (b) Stephens, DG, Powell, CA: Human Response to Aircraft and Other Noise Events, in Noise as a Public Health Problem, Proceeding of the 4th International Congress, Giovanni Rossi, MD, editor, Milano, Italy, Volume II, pp. 1061-1072, 1983.

- 1.a. Thank You
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.l. Points of Interest
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.t. Noise Mitigation

Coupeville, WA 98239

The Economic impact on the Central Whidbey community is not addressed adequately. Loss of tourism, property value loss, decline of population, & loss of business all need to be evaluated more carefully. • Section 4.10.2.1 describes the likely loss of property value due to increased noise, but doesn't quantify what that total effect will be. The EIS should quantify the loss of property value. • The "positive" economic effects of short-term construction, increased payroll, and increased tax revenues from an increasing population are quantified by the DEIS. However, that economic gain is not balanced against the certain economic losses of a reduced tax base due property devaluation, population migration away from noise in the region, loss of business, reduction in migration and investment in property by retirees and others of wealthier demographics who would otherwise move to Whidbey for the environment and quality of life, and support sustainable, local business, such as organic farming, custom home building, and renewable energy. The EIS needs to evaluate the economic losses associated with the proposal.

- 1.a. Thank You
- 12.d. Population Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.o. Cost-Benefit Analysis

Coupeville, WA 98239

Risks of single siting of all of the electronic warfare aircraft for the entire U.S. military mission at NASWI is not sufficiently evaluated in the DEIS. Such risks should be evaluated and include:

- Seismic events, including consequences of shaking, tsunamis, liquefaction and ground subsidence from a major Cascadia Fault subduction-zone earthquake. Section 3.14.2.3 in the DEIS inadequately and erroneously states that the “most recent apparent significant activity was approximately 18,000 years ago”. In fact, there is substantial evidence that a major earthquake affecting the entire Puget Sound region occurred as recently as the 1700’s. See Atwater, Brian F. et al., *The Orphan Tsunami of 1700: Japanese Clues to a Parent Earthquake in North America*, 2nd ed., United States Geological Survey and University of Washington Press, 2015. The best available science points to seven Cascadia Fault earthquakes having occurred in the last 3,500 years, with an average interval of 500 years. Some geologists estimate a 10% chance of such a major earthquake, with up to a magnitude of 9, occurring within the next 50 years. This seismic risk must be properly evaluated in the EIS.
- Terrorism, including access vulnerability of Ault Field and OLF. State Highway 20 borders the east side of OLF Coupeville. Patmore Road crosses the North end of runway 32 at the OLF. Keystone road borders the West boundary of the OLF. All these roads very close to and within eyesight of the runway. Additionally, the bridge, ferries, and NASWI Base utilities (water, electricity, gas) are an easy target for terrorists.
- Access to the base. Many NASWI personnel live off of Whidbey Island and commute via the ferries and Deception Pass Bridge. Disruption of service or failure of access of these will pose a major operational risk. Indeed, when all Coupeville to Port Townsend ferries were summarily removed from service on 11/21/2008 it caused a major transportation crisis. The 82-year old Deception Pass bridge is a critical access point risk that must be evaluated. The bridge has been identified as in-need of a seismic retrofit.
- Damage or maintenance to Ault Field runways will affect readiness and ability to deploy aircraft, or conduct routine training, leaving much of the military’s EW aircraft grounded.
- Utilities are vulnerable. The NASWI base and Oak Harbor city water supply cross the Deception Pass Bridge. The entire electricity supply for Whidbey Island crosses at Deception Pass – there is not a secondary supply route. The natural gas supply to North Whidbey Island, including the Base, also crosses at Deception pass. A single, catastrophic event at Deception Pass could affect all these utilities, and operations at NASWI.

1.a. Thank You

1.e. Risk of Terrorist Attack

14.d. Bridges and Ferries

16.a. Geological Hazards (Seismic, Liquefaction, Bluff Erosion, and Landslides)

3.h. Runway Usage, Flight Tracks, and Altitudes

Coupeville, WA 98239

A-weighted sound measurements (dBA) are used in the noise analysis of the DEIS, which emphasizes the 1,000 to 4,000 Hz range (DEIS at p. A-142). However, the Growler emits substantial low-frequency sound, not reported by dBA. See Environmental Assessment for the Expeditionary Transition of EA-6B Prowler Squadrons to EA-18G Growler at Naval Air Station Whidbey Island, Oak Harbor, Washington, Final, October 2012 (the "2012 EA"), Department of the Navy, pages 38-39, Wyle report WR 10-22. As stated therein, "NASWI has received complaints of building rattle/vibration due to Growler events . . . With its increased low-frequency content, the Growler takeoff events have higher potential to cause noise-induced vibration." Frequency profiles, shown on page 39 of that report, indicate substantial sound levels at frequencies below 100 Hz. dBA sound levels are, therefore, an incomplete measurement of Growler noise during FCLP operations which leads to underestimating perceived sound levels and effects on people and property. The final EIS should clearly convey the lack of correlation between dBA measurements and the Growler sound spectrum, or should adopt a different, or additional, measurement standard.

1.a. Thank You

4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations

4.k. Comparison of the Prowler to the Growler



Coupeville, WA 98239

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 4.t. Noise Mitigation

Growler noise mitigation and abatement methods, operations and techniques should be thoroughly considered in the EIS. The DEIS discusses aircrew compliance and performance of policy, procedures, course rules, "good common sense", and "prudent airmanship techniques" (pg 3-30) as established methods to minimize noise impacts. Additionally, "NAS Whidbey Island has historically worked with elected officials from surrounding communities to best minimize impacts where practicable, including not flying at the OLF on weekends and minimizing flight activity during major school testing dates and major community events." • Technical modifications to the Growler for noise abatement should be discussed. • Moving some of the OLF FCLP training operations to other base locations in squadron detachment deployments should be discussed. • The historical precedent to not fly at the OLF on weekends, etc. should clearly be stated as a voluntary Navy guideline and not compulsory. I.E. Growlers may be scheduled to fly at the OLF whenever the NASWI command determines it is required for the mission.

Coupeville, WA 98239

Impact to natural resources is not addressed adequately in the DEIS. Impacts to the following should be addressed more completely in the EIS: • Bird populations & migration. Whidbey Island is a major bird migration route within the Pacific Flyway. • Fish and animal habitat. • Ebey's Landing National Historic Reserve, including the rural soundscape & visitor experience. • Surface and ground water quality, including from Growler fuel dumping, crashes, and crash response.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.l. Bird Migration
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 6.f. Fuel Dumping
- 7.g. Ebey's Landing National Historical Reserve

Coupeville, WA 98239

The risk of water contamination to the sole-source aquifer in central Whidbey Island surrounding OLF Coupeville is not adequately addressed in the DEIS. The following should be evaluated:

- Risk and effects of a Growler crash and of the aqueous film forming foam that will be used for firefighting.
- The susceptibility of geology and soils in the potential aircraft accident zones surrounding the OLF to infiltration of pollutants into the ground water.
- No alternative water source for Town of Coupeville and surrounding community.
- Viability, cost, and impact of remediation of groundwater pollutants and of providing alternative drinking water source.
- The full short and long-term impacts, including environmental, cultural, & financial.

1.a. Thank You

11.a. Groundwater

11.d. Per- and Polyfluoroalkyl Substances

12.k. Compensation to Citizens for Private Property

Coupeville, WA 98239

1.a. Thank You  
4.j. Other Reports

The EIS should fully discuss the 2016 National Park Service (NPS) sound monitoring report in Ebey's Landing National Historic Reserve (ELNHR), as compared to the Day-Night Average Sound Level modeling method used (DEIS, pg 1-23). The actual sound measurements made in the NPS report suggest that the noise predicted by the modeling used in the DEIS could be dramatically under estimated.

Coupeville, WA 98239

1.a. Thank You  
2.k. Range of Alternatives  
2.l. No Action Alternative

Alternatives to increasing Growler operations at the Coupeville OLF should be fully addressed in the EIS. The discussion should include consideration of the following:

- The “No Action” alternative in the DEIS was dismissed as not meeting the Navy’s mission objectives, without a full and objective evaluation of alternatives. This is in violation of NEPA requirements. By not considering viable alternatives that could meet the Navy’s mission without increasing operations at OLF Coupeville the DEIS appears to justify a predetermined decision.
- Other landing strips in the region were dismissed as not viable for reasons including not meeting Navy safety standards for OLF’s. This evaluation neglected the fact that OLF Coupeville, itself, does not meet Navy OLF standards.
- Detachment training options, at other military air stations that meet standards for FCLP training. Such detachment training is presently being conducted for squadrons from NASWI.

Coupeville, WA 98239

The impact on Children is not adequately addressed in the DEIS. The EIS should fully consider the following:

- Learning disability: The DEIS describes increased interruptions at school, but not how this will impact learning. Learning disability outside of the classroom should also be evaluated.
- Hearing damage: Many children live, attend school, and play within areas impacted by this proposal, in which increased noise will cause hearing damage. The National Institute of Health (NIOSH, <https://blogs.cdc.gov/niosh-science-blog/2016/02/08/noise>) states that the maximum daily noise dose is reached in 15 min at 100 dB and, that for every 3 dB increase in noise, the allowable exposure time is reduced by half. By these guidelines the maximum daily noise exposure is 3 minutes at 109 dB. This exposure level is currently common in a wide area of central Whidbey Island near the OLF. The proposed action will dramatically increase likely hearing damage to children.
- NIOSH (see above) recommends that hearing protection be worn whenever noise levels exceed 85 dB(A), regardless of duration. This peak noise level will be realized at Coupeville schools, playfields, and Rhododendron park ball fields. The EIS should discuss how the Navy will provide hearing protection education, and how use and adoption of hearing protection most days throughout the year will be realized and expected hearing damage for the expected number of children who will not adopt/use hearing protection.
- Noise impacts at the Coupeville Elementary School is evaluated in the DEIS. The EIS should also evaluate impacts at Coupeville High School and Middle School, which are significantly closer to the OLF noise source than the elementary school.
- The impact on children (as well as parents and coaches) using the ball fields at Rhododendron Park, including scheduling operations so as to minimize impacts and hearing damage. The analysis should recognize the difficulty of logistics and implementation for using hearing protection while practicing and playing soccer, baseball and softball games.

1.a. Thank You

4.l. Points of Interest

4.o. Classroom Learning Interference

4.q. Potential Hearing Loss

5.d. Environmental Health Risks and Safety Risks to Children

Coupeville, WA 98239

- 1.a. Thank You
- 2.k. Range of Alternatives
- 3.h. Runway Usage, Flight Tracks, and Altitudes

OLF Coupeville operations are misrepresented as historically normal in Section 1.4. Section 4.1.2.1 misstates that proposed action "represents a level of operation similar to historic levels of operations experienced over the life of the airfield". The graph of Previous Airfield Operations for Ault Field and OLF Coupeville on page 1-6 shows that from 1976 through 2015 OLF Coupeville experienced an average of approximately 13,200 operations per year. A more representational average would be for the 18 years since the A-6 Intruder stopped flying in 1997, which is approximately 5,500 operations per year. The proposed increase of 29,000 operations under Alternative A would be a total of approximately 34,500 operations per year. At no time in the history of OLF Coupeville has the number of operations been at the proposed level under this Alternative. This action would be, in fact, an increase of approximately 530% over the average operations since 1997. The proposed increase of 2,700 operations under Alternative C would be a total of 8,200 operations per year. This would represent a 49% increase over the historical average of FCLP operation at OLF Coupeville since 1997. Thus, the EIS should state that, under any scenario, the proposed action represents a significant change in the number of operations at OLF Coupeville.

Langley, WA 98260

I have numerous concerns about the Navy's plan to increase activities, particularly the Growler training in our densely populated Pacific Northwest/Puget Sound region. I believe the assessment made that these increased activities will not cause significant harm are incorrect. 1. The water contamination to wells in the Coupeville area from flame retardants is enough right there to stop operations...at least until some other kind of flame retardant has been found. More planes increases the risk of accidents and we need to protect our sole source aquifer here on Whidbey Island. We are surrounded by salt water. We need clean water to drink and to water our food crops. Animals also need clean water. 2. The decibel levels have been averaged in the EIS and do not reflect the damaging health effects of decibels to humans and animals on land and in the sea and air. 3. Increased use of OLF under scenario "A" or "B" will create unacceptable noise impacts on residential areas. Under the Navy's own standards, existing development in the vicinity of OLF precludes the proposed action. In Naval Weapons Systems Training Facility Boardman Final Environmental Impact Statement, Department of the Navy, December 2015, Table 3.4-1 states that Noise Zone III (>75 dBA) is incompatible with residential/noise-sensitive land uses, and that Noise Zone II (65-75 dBA) is normally incompatible with such uses. Table 3.4-1 particularly points to residences, mobile home parks, transient lodging, schools, hospitals, and churches as being incompatible with Noise Zone II. In addition, the Navy has previously stated that APZ1 [Accident Potential Zone] and APZ2 are "clearly incompatible" with housing and that Noise Zone II, even in the absence of an APZ, is "normally incompatible" with housing (Draft Environmental Impact Statement (EIS) for Development of Facilities to Support the West Coast Basing of the F/A-18E/F Aircraft, 1997 at Fig. 3-1). Proposed Alternative 1A in the DEIS puts the local Kingdom Hall of Jehovah's Witnesses; Centerpoint Christian Church; Ryan's House, a temporary shelter for homeless youth; and the Admirals Cove, Crocket Lake Estates, Shangri-la Shores, Race Road, Race Lagoon, Harrington Road, Harrington Lagoon, Snakelum Point, and Kineth Point neighborhoods inside the 75 dB DNL noise contour (i.e., in Noise Zone III; see Fig 4.2-5). Coupeville Middle/High School, the Pennington Hill neighborhood, and the Olympic View Mobile Home Park are all within the 65 dB contour (Noise Zone II). These existing land uses are incompatible with the proposed action according to the Navy's own standards ("Existing residential development is considered as pre-existing, incompatible land uses." Department of Defense Instruction Number 4165.57, 2011, 2015 at page 27). Proposed alternatives 2A (Fig. 4.2-12) and 3A (Fig. 4.2-19) are similarly problematic. Alternatives 1B (Fig. 4.2-6), 2B (Fig. 4.2-13), and 3B (Fig. 4.2-20) would also put most of these areas in the same incompatible noise zones. Even the C alternatives render at least most of the Admirals Cove neighborhood uninhabitable under published standards. Under land use compatibility guidelines shown in DoD Instruction No. 4165.57, APZ-I is incompatible with residential housing, and APZ-II is compatible only with detached, single units at a maximum density of 2 units/acre. The "Conceptual" APZ I shown in Fig. 4.3-1 encompasses much of Admirals Cove, as well as the Ryan's House shelter. The "Conceptual APZs" shown in Fig. 4.3-2 further encompass residential developments along Race Rd., Harrington Rd., and Harrington Lagoon that exceed the density limits for APZ-II in the DoD Instruction. The final EIS must describe what steps will be taken to mitigate the effects of APZs. 4. The

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 11.d. Per- and Polyfluoroalkyl Substances
- 2.a. Purpose and Need
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.d. Program of Record for Buying Growler Aircraft
- 2.k. Range of Alternatives
- 3.a. Aircraft Operations
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.j. Other Reports
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 7.a. Regional Land Use and Community Character
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones
- 7.j. Impacts on Outdoor Sports



DEIS relies on noise models that are outdated and inaccurate. The DEIS relies too heavily on noise modeling in lieu of actual sound measurement. There is no indication in the DEIS that the noise models were ever tested against actual measurements made in the affected area. Given that noise measurements made by the National Park Service (DEIS at page 1-23) and JGL Acoustics, Inc. (DEIS at page C-124) differ significantly from model-based predictions, the models should be tested and modified if necessary. The NOISEMAP software used for computer modeling appears to be an outdated version from 2008 or earlier (DEIS at page A-21). A Department of Defense report prepared in 2010 states, "The acoustic environments in the vicinity of newer aircraft such as the . . . F/A-18E/F differ from those of most prior aircraft, with high noise levels associated with higher thrust engines. At those high levels, acoustic propagation cannot be modeled using the same simple linear theories employed in the classic noise models." (<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>; emphasis added). The noise modeling used for the DEIS is also inaccurate because it relies on A-weighted sound measurements, which emphasize the 1,000 to 4,000 Hz range (DEIS at page A-142). However, the Growler is known to produce substantial low-frequency sound according to the Department of the Navy in Environmental Assessment for the Expeditionary Transition of EA-6B Prowler Squadrons to EA-18G Growler at Naval Air Station Whidbey Island, Oak Harbor, Washington, Final, October 2012 at pages 38- 39 of the included Wyle report WR 10-22. This study states, "NASWI has received complaints of building rattle/vibration due to Growler events . . . With its increased low-frequency content, the Growler takeoff events have higher potential to cause noise-induced vibration." Frequency profiles, shown on page 39 of the report, indicate substantial sound levels at frequencies below 100 Hz. A-weighted sound levels are therefore an inaccurate measurement of Growler noise during FCLP operations and lead to underestimating perceived sound levels and effects on people and property. The final EIS should clearly convey the lack of correlation between A-weighted measurements and the Growler sound spectrum or should adopt a different measurement standard. For example, Effective Perceived Noise Level, which takes into account tone components and duration, may be more appropriate than dBA. See, 14 CFR Appendix A to Part 36. 5. The Coupeville Middle School was not included as an affected location. FCLPs at OLF are conducted at altitudes of 0 – 600 ft above ground level (DEIS at p. 1-8). If a Growler deviates from the flight track and passes over Coupeville Middle/High School, the noise level could exceed 109 dBA (DEIS at Table 3.1-2). Based on the "Typical FCLP Operation" shown in the brochure Growler Aircraft Operations at NAS Whidbey Island and OLF Coupeville, 2015, a jet deviating from the flight track could pass over the school at less than 500 feet above ground level, increasing the noise level to greater than 109 dBA. According to the DEIS at page A-169, "One laboratory study (Ising et al. 1999) concluded that events with Lmax above 114 dB have the potential to cause hearing loss." A Boys and Girls Club is slated to be built on South Main Street south of the Middle/High School campus, and a daycare center (Ebay Academy) is located across Terry Rd. from the Middle/High School. It is recognized in the DEIS that daycare centers are incompatible with high noise levels: "While there are many factors that can contribute to learning deficits in school-aged children, there is increasing awareness that chronic exposure to high aircraft noise levels may impair learning. This awareness has led WHO and a North Atlantic Treaty Organization (NATO) working group to conclude that daycare centers and schools should not be located near major sources of noise, such as

highways, airports, and industrial sites." (Page A-176; emphasis added). 6. I think it is strategically unwise to have all the Growlers at one location. They could be taken out with one bomb. It's time the Navy considered another location such as NWSTF Boardman as an alternative to the OLF site to accommodate the increased Growler aircraft. This alternative would minimize new environmental impacts for Ebey's Landing Historic Reserve and the Central Whidbey Island community. It could also decrease FCLPs at Ault Field while retaining the economic benefits of the Growler community in Oak Harbor. Boardman has already completed an EIS and there just is not the population there that would be effected. The cost could be covered by just producing a couple fewer Growlers. Thank you for your time in taking these comments. I hope, pray and trust that changes can be made that support the well being of citizens of the United States that live here on Whidbey Island as well as on Lopez and Port Townsend, areas also affected by the noise. It is the job of the military to defend our nation in order to protect the health, safety and well being of the people of the United States. It seems so contradictory to create such suffering in the name of protecting. Sincerely, [REDACTED] Langley, Washington

Langley, WA 98260

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP).

Langley, WA 98260

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.g. Average Annual Day/Average Busy Day Noise Levels

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance.



# Public Meeting Comment Form

Thank you for attending the public meeting on the Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) Provide written comments at today's public meeting; (2) Speak with the stenographer, who will record your comments; (3) Submit your comments on the project website at www.whidbeyeis.com; or (4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

- 1.a. Thank You
- 12.j. Property Values
- 2.d. Program of Record for Buying Growler Aircraft
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 4.t. Noise Mitigation
- 5.a. Accident Potential Zones

1. Name [REDACTED]

2. Organization/Affiliation \_\_\_\_\_

3. Address [REDACTED] Langley WA 98260

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

1. Who does the engineering design for the Growlers. I heard that the planes are designed for optimal performance. What degree of performance is enough & at what expense is a greater degree of performance?

The US military's mission is to defend & protect the constitution & the people of the United States. Right now the military is the enemy of the people who are being made sick, losing their livelihood & if they can afford it, moving after their property values plummet.

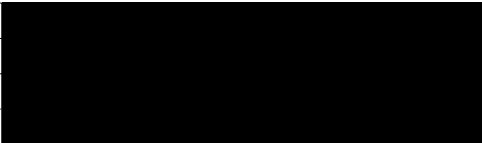
Please print • Additional room is provided on back  
 Please drop this form into one of the comment boxes here at the public meeting or mail to: ➔  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

All comments must be received by January 25, 2017. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

At what point is the cost of "performance" too high? When are you not defending us & instead harming us? It's like how much, enough money & possessions. When is it time to let go of making the most money possible & address quality of life in other ways? Could there not be a redesign of the Grabler engine that would still have great speed, maneuverability, all the electromagnetic frequency sophistication, but had a ~~total~~ <sup>enough</sup> degree less of performance to allow the decibels created to be in a more healthy range.

The decibels are just too much for this community - for people. ~~wasn't~~ The computer modeling program used to calculate noise levels (NoiseMap Version 7.2) was found by ~~the~~ SERDP to be outdated. Sorry - it's gotta move to somewhere w/ less people - yep... it will cost... but people's lives are worth that.



For more information, please visit the project website at [whidbeyeis.com](http://whidbeyeis.com)

Please print  
Please drop this form into one of the comment boxes here at the public meeting or mail to:  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

Oak Harbor, WA 98277

1.a. Thank You

2.m. Record of Decision/Preferred Alternative

I support the continued use and expansion based upon operational needs of the Navy. Scenario A is indicated based upon the long standing history of the base and the informed decisions that all home owners made. To alter the historical flight patterns will affect those who took the existence and purpose of the vital operations into account. Any reduction in the use of the OLF increases the numbers of residents negatively affected which exacerbates the situation.

Langley, WA 98260

Feb 24, 2017 I have newly moved to Whidbey Island and have only today found out about the Navy's plans to expand Growler and other operations on the island. I wish I had more time to explore the issues, but your deadline for comments is today, so, given the time constraints, my cursory comments here will have to suffice. My apologies for foregoing the usual niceties in commending your efforts, but time is of the essence to meet your deadline. I have many concerns about the proposed expansion, concerns that, at least with a cursory review of the draft EIS (dEIS), do not appear to be adequately addressed in the dEIS. My concerns include the following: • The substantial increase in flights and the resulting substantial increase in noise associated with those flights; • The Navy's inadequate assessment of that noise; • The ground water contamination from the use of flame retardants and fire extinguishing chemicals; • The inadequate assessment of this ground water contamination, especially given that Whidbey Island is a designated Sole Source Aquifer under the Safe Drinking Water Act; • The impacts on fragile shorelines and cliffs from the vibration resulting from these flights – I myself live in a neighborhood where the local Homeowners' Association has had to assess a considerable increase in homeowners' dues because of high bank slippage and the resulting impacts on beach access roads, quite possibly exacerbated by the vibrations from the Navy's aircraft; • The dumping of excess fuel in the Salish Sea – does the Navy realize that the US and Canada have expended millions of dollars to clean up the waters of Puget Sound and the Strait of Georgia? And yet the Navy is dumping excess fuel in these waters? Really? • The impacts on human health and wildlife from the increased noise, vibrations, low frequency sound, and soil and water contamination; • The impacts on natural areas, human enjoyment of these natural areas, and overall quality of life on the island; • The contribution to greenhouse gas emissions and resulting climate change effects from this increased use of fossil fuels – yes, only a small amount in the grand scheme of greenhouse gas emissions, but that is the issue with greenhouse gases – i.e., each incremental increase contributes to the cumulative effect; • The long-term intent of the Navy in its Pacific Rim Readiness strategy – I can't help but wonder if the intent is to keep expanding and ultimately impact all of Whidbey Island, maybe all of the northern portion of the Olympic Peninsula, maybe also the whole San Juan Islands area with increased Growler, etc., operations; • The lack of alternatives presented and analyzed by the Navy; • The lack of mitigation measures presented and analyzed by the Navy. I am not an "anti-Military" type of person. But at some point, the question should be raised, "Are we destroying our homeland in order to protect our homeland?" Or just how far is an "acceptable" level of exposing the general US Citizenry to "War Zone" types of experiences in order to keep people safe? This is the Pacific Northwest. It is one of the last relative strongholds of some semblance of ecological integrity in the lower 48. Why is the military insisting on such a massive increase here? I can't help but think that there is a notion from the Navy that this type of action can be "forced" on the citizenry of Whidbey Island, especially south of Oak Harbor, because the island has such a small population . . . and nowhere near the voice of more populated areas. But this type of notion presents a serious Environmental Justice issue. On its website, the Navy states, "Once completed, the EIS will meet the requirements of the National Environmental Policy Act of 1969 (NEPA)." However, this does not appear to me to be the case. • The draft EIS (dEIS)

- 1.a. Thank You
- 1.d. General Project Concerns
- 11.d. Per- and Polyfluoroalkyl Substances
- 18.a. Climate Change and Greenhouse Gases
- 18.d. Washington State Greenhouse Gas Goals
- 19.b. Revised Cumulative Impacts Analysis
- 2.a. Purpose and Need
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.k. Range of Alternatives
- 2.l. No Action Alternative
- 2.m. Record of Decision/Preferred Alternative
- 4.d. Day-Night Average Sound Level Metric
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.d. Recreation and Wilderness Analysis and Study Area



does not adequately present information on and assessment of a “No Action” alternative. It appears to dismiss the “No Action” alternative outright. • The alternatives that are presented do not adequately comply with NEPA. o For example, assessing sites away from Whidbey Island are dismissed outright. o For example, assessment of cumulative effects is inadequate. o For example, how these alternatives (specific for the near-term) fit into the long-term plans of the military build-up in the Pacific Northwest is not adequately explained or assessed. There is language in the dEIS that suggests a greater long-term build-up is expected – e.g., “the noise discussion uses the year 2021 to describe the affected environment, when previous aircraft loading decisions unrelated to the Proposed Action are expected to be fully implemented and complete,” (p. 1-8) – but this expected further expansion is not adequately included in the cumulative effects assessment. • The noise assessment and the resulting health effects is particularly poor. Averaging dB exposure over a 24-hour period seems rather devious in this case. This is not the scenario of workers in a factory who are exposed to noise throughout their working shifts – such a scenario and analysis should not be utilized here. • The low-frequency assessment is inadequate. In the geographic area where I previously lived, whole communities were abandoned because of severe human health impacts after wind turbine “farms” were developed near these communities. In the years before I left that area, noise and ultra low-frequency sound waves were suspected as key contributors to the health impacts. • Implying that impacts are not an issue based on a lack of research assessing the particular impacts is disingenuous at best. • Mitigation options are not adequately explored in the dEIS. • Indications are that the Navy has already made a decision rather than complying with the purpose of NEPA that the EIS be developed and the EIS process be undertaken to inform the decision-maker (as well as the public) BEFORE a decision is made. In addition, it was made clear at one public meeting that the Navy has already eliminated all but one of the distribution scenarios considered in the dEIS, that being the bulk of the increase will be at Coupeville because Ault Field can’t accommodate much more increase of flights. Language in the dEIS appears to advocate the position that the vast increase is expected to be at Coupeville rather than Ault Field. o For example, “Using OLF Coupeville allows the Navy to conclude daily operations in less time, thereby reducing community impacts.” (p. 1-7) o For example, “Performing FCLP at Ault Field can be more impactful to the community by extending flight patterns, repeating training, extending daily operations later into the night, and impacting more densely populated areas.” (p. 1-8) These types of statements (verbal and written) indicate a Navy stance that undermines the very intent of NEPA to inform the decision-maker BEFORE the decision is made. The NEPA process is not supposed to be about justifying a decision that has for-all-intent-and-purpose already been made (except for the ROD and media releases). Rather, the NEPA process was devised to ensure environmental impacts are adequately explored and assessed and the decision-maker is adequately informed BEFORE making a decision. In order to meet your comment deadline of Feb 24th, I must now close. Thank you for your consideration of my comments, [REDACTED], concerned resident of Whidbey Island

Port Townsend, WA 98368

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 To Whom It May Concern: I would like to take this opportunity to comment on the draft EIS that our neighbor the US Navy on Whidbey Island has recently issued. I actively chose to live in this amazing part of the world thirty years ago, in large part because of the natural beauty and peace of the area. The charm of the site was further enhanced by the quiet grace of the small historic Victorian seaport community of Port Townsend, along with its proximity to the wilderness areas of the U.S. Forest Service and adjoining Olympic National Park. At that time, our proximity to the naval base at Whidbey Island was not an active concern, and it seemed that the Navy was sensitive to being a good neighbor to the many of us with whom it shares land, sea, and air space. This has dramatically changed in the last few years, however, and it seems that the Navy has even more ambitious plans in the years ahead to turn Whidbey Island and the Olympic Peninsula into an arena for war games. This is entirely unacceptable, not only for the civilian residents of Whidbey Island and the Olympic Peninsula, but for the protected species of the Olympic National Park, a UNESCO World Heritage Site, which will be impacted by the cumulative effects of the current Navy proposals. What follows is an overview of the primary concerns that we have with the Navy's proposals: 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its "study area" is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as "normally unacceptable" and above 75 as being "unacceptable." (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.d. Recreation and Wilderness Analysis and Study Area
- 8.a. Cultural Resources Area of Potential Effect
- 8.b. Section 106 Process
- 8.c. Noise and Vibration Impacts to Cultural Resources

recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are "no significant impacts." The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) "...does not allow an approach that would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact." The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is "turning out fully trained, combat-ready Electronic Attack crews." 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The "30-day waiting period" proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors

who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant."

(<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the "loser" among these communities. 8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, "[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to "identify the agency's preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . ." Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative. 9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are "tiered" for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula. 10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the "Affected Noise Environment" around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy's ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no

noise modeling or measurements have been done for these areas. 11. The Navy's claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the "library" of sounds that comprise the basis for the Navy's computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS that wildlife are "presumably habituated" to noise do not apply when that noise is sporadic and intense. 12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy's benefit, but does not benefit the public. 13. The Navy's noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software "...do not properly account for the complex operational and noise characteristics of the new aircraft." This report concluded that current computer models could be legally indefensible.

(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term "event," but does not define it. Therefore, the time, duration, and number of jets in a single "event" remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public's ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service's draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with "...opening day and associated opening weekend of Washington State's Big Game

Hunting Season for use of rifle/guns.” While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: “Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL.” This guidance further states, “Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure.” If this official guidance directs Growlers to fly at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled “Representative Sound Levels for Growler Aircraft in Level Flight,” on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, “...but may be developed and altered based on comments received.” Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be “...identified in the Final EIS or Record of Decision.” Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy’s proposal to not allow a comment period on the Final EIS would be unlawful. 20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. 22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, “No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and

operation of additional Growler aircraft.” While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant. 23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls “historic” use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health advisories for two PFCs, and the Navy announced in June that it was in the process of “identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam].” Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: “Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e).” The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word “perfluoroalkyl” or “PFAS” is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals. (<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft’s flight operations and say that’s all you’re looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy’s study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual “events,” which by their erratic nature

cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is "greatest during flight operations." However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is "highly unlikely," largely because "no suitable habitat is present." This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB. (<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds," (<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, [REDACTED]



1.a. Thank You

Clinton, WA 98236

Our pilots need training to remain the best in the world, and the OLF is an ideal place to do it. Any attempts to close it will be detrimental to their training and also the Whidbey economy.

Coupeville, WA 98239

EA-18G Growler EIS Project Manager Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard Norfolk, VA 23508 Attn: Code EV21/SS Re: Draft  
Environmental Impact Statement for EA-18G Growler Airfield Operations at Naval Air  
Station Whidbey Island Complex Public Comment Dear Sir or Madam: Thank you for  
extending the public comment period for an additional 30 days. PERSONAL NOISE  
IMPACT We live at a location in Coupeville, which is about three air miles from the north  
west end of the Coupeville Outlying Field (OLF) landing strip. We are retired and had our  
house built here in 2007 and were notified about the OLF and its potential noise impact  
on our location by our realtor. For seven years or so we became accustomed to the use  
of the field by the Prowler fleet, and were not bothered much by it, except when a plane  
would fly directly over our house, which was extremely loud. But when the Growlers  
started to be integrated into the mix, we definitely noticed an increase in the noise level.  
When the fleet became entirely Growlers, our ability to tolerate the noise decreased and  
our level of irritation increased. We have no idea what the decibel levels at our house are,  
but if we are working in our garden, conversation is not possible and ear protection is  
necessary. We ride our bikes often, and our favorite route goes around Crockett Lake  
and up Wanamaker Road, which is under the flight pattern for the OLF. A few times we  
have been in that area when the Growlers have been practicing field landings, and the  
only way to describe the experience is "excruciating." We now understand how the  
people who live directly under the flight pattern feel. We understand that the Navy's  
preferred plan for OLF Coupeville, as outlined in the DEIS, will increase flight operations  
from a current average of 6,100 to 35,100 per year, increasing current operations by  
six-fold. This is an average of 135 operations per day, every day, except weekends. In  
our opinion, this transforms a barely tolerable situation into an intolerable situation.  
PROPERTY VALUE IMPACT Coupeville, and Whidbey Island, has been such a fantastic  
place to live and we have intended to stay here until the end of our lives. However, if the  
Navy's preferred plan for OLF Coupeville is carried out, and the impact is intolerable, we  
may have to consider moving. We can only imagine, that in this case, property values in  
this location will have dropped substantially. This situation would not be good for us.  
POTENTIAL ALTERNATE LOCATIONS FOR FIELD CARRIER LANDING PRACTICE  
(FCLPs) We understand that Navy pilots and crew members need rigorous training to  
safely take off and land on aircraft carriers. Day and night carrier landing practice is  
essential to their safety. We support the Navy's mission to keep us safe and believe this  
can be accomplished without increasing FCLPs at OLF Coupeville. We are assuming that  
most people would not like to have an OLF close to them, and this makes it difficult for  
the Navy to find suitable locations for FCLPs. Has the Navy considered using NWSTF  
Boardman as an alternative to OLF Coupeville? Thank you for considering our comments  
on the DEIS for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island  
Complex. Will you please include a 60-day comment period after the Final EIS is  
published. Respectfully submitted, [REDACTED] Coupeville, WA 98239

- 1.a. Thank You
- 12.j. Property Values
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.a. General Noise Modeling
- 4.k. Comparison of the Prowler to the Growler
- 4.l. Points of Interest
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.q. Potential Hearing Loss

EA-18G Growler EIS Project Manager  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard  
 Norfolk, VA 23508  
 Attn: Code EV21/SS

Re: Draft Environmental Impact Statement for EA-18G Growler Airfield Operations at  
 Naval Air Station  
 Whidbey Island Complex  
 Public Comment

Dear Sir or Madam:

Thank you for extending the public comment period for an additional 30 days.

### **PERSONAL NOISE IMPACT**

We live at a location in Coupeville, which is about three air miles from the north west end of the Coupeville Outlying Field (OLF) landing strip. We are retired and had our house built here in 2007 and were notified about the OLF and its potential noise impact on our location by our realtor.

For seven years or so we became accustomed to the use of the field by the Prowler fleet, and were not bothered much by it, except when a plane would fly directly over our house, which was extremely loud. But when the Growlers started to be integrated into the mix, we definitely noticed an increase in the noise level. When the fleet became entirely Growlers, our ability to tolerate the noise decreased and our level of irritation increased. We have no idea what the decibel levels at our house are, but if we are working in our garden, conversation is not possible and ear protection is necessary. We ride our bikes often, and our favorite route goes around Crockett Lake and up Wanamaker Road, which is under the flight pattern for the OLF. A few times we have been in that area when the Growlers have been practicing field landings, and the only way to describe the experience is "excruciating." We now understand how the people who live directly under the flight pattern feel.

We understand that the Navy's preferred plan for OLF Coupeville, as outlined in the DEIS, will increase flight operations from a current average of 6,100 to 35,100 per year, increasing current operations by six-fold. This is an average of 135 operations per day, every day, except weekends. In our opinion, this transforms a barely tolerable situation into an intolerable situation.

### **PROPERTY VALUE IMPACT**

Coupeville, and Whidbey Island, has been such a fantastic place to live and we have intended to stay here until the end of our lives. However, if the Navy's preferred plan for OLF Coupeville is carried out, and the impact is intolerable, we may have to consider moving. We can only imagine, that in this case, property values in this location will have

- 1.a. Thank You
- 12.j. Property Values
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.a. General Noise Modeling
- 4.k. Comparison of the Prowler to the Growler
- 4.l. Points of Interest
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.q. Potential Hearing Loss

dropped substantially. This situation would not be good for us.

**POTENTIAL ALTERNATE LOCATIONS FOR FIELD CARRIER LANDING PRACTICE (FCLPs)**

We understand that Navy pilots and crew members need rigorous training to safely take off and land on aircraft carriers. Day and night carrier landing practice is essential to their safety. We support the Navy's mission to keep us safe and believe this can be accomplished without increasing FCLPs at OLF Coupeville. We are assuming that most people would not like to have an OLF close to them, and this makes it difficult for the Navy to find suitable locations for FCLPs. Has the Navy considered using NWSTF Boardman as an alternative to OLF Coupeville?

Thank you for considering our comments on the DEIS for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex. Will you please include a 60-day comment period after the Final EIS is published.

Respectfully submitted,

[REDACTED]  
Coupeville, WA 98239

[REDACTED]

Bellevue, WA 98007

I am writing today to urge you -- do not allow any additional Growlers on Whidbey Island. These jets accelerate our climate crisis and disrespect the meaning and intent of a National Park by creating un-planned closures. Their level of noise is so high that it's very detrimental to both birds and people on the Olympic Peninsula when these jets are used in that area. Additional Growlers should not be allowed on Whidbey Island. Thank you.

1.a. Thank You

18.d. Washington State Greenhouse Gas Goals

19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training

7.d. Recreation and Wilderness Analysis and Study Area

Anacortes, WA 98221

Addressing the increase of NAS Whidbey Growler aircraft mandates careful recognition of the unique socio-ecological setting of the islands of northwestern Washington State. While the EIS candidly details many deleterious effects to expansion on the immediate Whidbey Island airspace, it insufficiently addresses overall impact on the Whidbey/Fidalgo/San Juan Island region's future quality of life. While disclosing the immediate detrimental effects of increasing noise, pollutants, traffic, infrastructure strain, and other effects, the EIS fails to address the impact this intended expansion will have on the psychological, cultural, artistic, and recreational well-being of the residents and tourists of this ecologically sensitive locus of profound natural beauty. These factors—each related to personal and community health, economics, ecologies, and civic responsibilities— are not insignificant and should be more fully weighed and addressed. Furthermore, the EIS reports the proposal's cumulative, long-term diminishment of air, water, sound, and transportation quality on the region. The clear, negative impact of the expansion needs a significantly more robust mitigation plan before its implementation. Other, less sensitive Naval locations are clearly more suited to this level of Growler operation. As noted in the EIS Executive Summary (p. 2), moving this activity to a less geographically congested and ecologically sensitive locale is possible, but dismissed related to additional Naval expense. The region's inhabitants should not bear the weight of this budgetary choice.

- 1.a. Thank You
- 1.d. General Project Concerns
- 12.h. Tourism
- 12.n. Quality of Life
- 2.n. Alternatives Considered But Eliminated
- 4.t. Noise Mitigation

Anacortes, WA 98221

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- 12.h. Tourism
- 12.n. Quality of Life
- 2.n. Alternatives Considered But Eliminated
- 4.t. Noise Mitigation

camano island, WA 98282

1. The DEIS did not comply with the National Environmental Policy Act(NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP). 2. The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance. 3. The DEIS claim that the JGL noise study was "flawed" is disingenuous and unsupportable, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data. 4. Island County land-use policies, plans, as reflected by the construction permits issued, have largely defied the Navy's 2005 AICUZ directives for Outlying Field Coupeville, such as no residences in anoise zone 2. Whether due to willful intent to ignore by the County or to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and attendant land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should be immediately advocating to the County to place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved. 5. The two most dangerous aspects of flying are the approach,landing and takeoff -- in other words most of the OLFC flight path. The risks are significant (a) because of significant encroachment problems, (b)because OLFC is about 49,000 acres below and the runway about 3000 feet short of standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes with the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs off a suitable 21<sup>st</sup> century off-Whidbey site. 6. Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the past,present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of these wells. Leakage of PFAS in storage or use in a crash event is a hugely relevant environmental impact must be addressed and the public must be given the opportunity to comment. 7. The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013,when the transition to Growlers was complete, the highest use of Path 14 has been about 2 to 10 because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% overestimated use of Path 14 greatly understates the DNL noise impacts for Path 32 and overstates the impacts on Path 14. This mistake must be corrected. 8. The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the "percent probability of awakening for all scenarios..." While music torture is still permitted under US law,the United National Convention against Torture defines torture as "any act by which severe pain of suffering, whether physical or mental..." Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.e. Field Carrier Landing Practice Patterns
- 3.f. Field Carrier Landing Practice Operation Totals
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.j. Other Reports
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children
- 7.c. Noise Disclosure

hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations. 9. The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and analyzed. 10. The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated. 11. The DEIS fails to adequately address the effects of high noise levels during pregnancy provoking significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.

camano island, WA 98282

We strongly object to the toxic noise of the growlers and my lowered property value because of them. We moved here to enjoy working outside, but that's impossible while they're flying. They should be moved to a less populated area.

- 1.a. Thank You
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 2.n. Alternatives Considered But Eliminated

Issaquah, WA 98027

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments

I would like to request an extension of 45 more days on the decision to add 36 more Growlers to NASWI, in order to have sufficient time to comment on this issue, because I am unable to dedicate time to it now, during the holiday season.

Coupeville, WA 98239

The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly reduce property values. Our property already has lost around \$100,000 in value during the past five (5) years. Were will it end? Is the Navy to re pay us for our financial loss?

- 1.a. Thank You
- 12.j. Property Values
- 12.k. Compensation to Citizens for Private Property
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

Port Townsend, WA 98368

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 19.a. Scope of Cumulative Analysis
- 19.b. Revised Cumulative Impacts Analysis
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 19.h. Cumulative Impacts on Biological Resources
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.d. Arrivals and Departures
- 4.a. General Noise Modeling
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 8.a. Cultural Resources Area of Potential Effect
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.j. City of Port Townsend Cultural Resources



know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are "no significant impacts." The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) "...does not allow an approach that would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact." The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is "turning out fully trained, combat-ready Electronic Attack crews." 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The "30-day waiting period" proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the

technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.”

(<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the “loser” among these communities. 8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, “[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to “identify the agency’s preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . .” Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative. 9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are “tiered” for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula. 10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the “Affected Noise Environment” around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy’s ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas. 11. The Navy’s claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the “library” of sounds that comprise the basis for the Navy’s computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS

that wildlife are “presumably habituated” to noise do not apply when that noise is sporadic and intense. 12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy’s benefit, but does not benefit the public. 13. The Navy’s noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software “...do not properly account for the complex operational and noise characteristics of the new aircraft.” This report concluded that current computer models could be legally indefensible.

(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term “event,” but does not define it. Therefore, the time, duration, and number of jets in a single “event” remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public’s ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service’s draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with “...opening day and associated opening weekend of Washington State’s Big Game Hunting Season for use of rifle/guns.” While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: “Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL.” This guidance further states, “Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure.” If this official guidance directs Growlers to fly

at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful. 20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. 22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant. 23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health

advisories for two PFCs, and the Navy announced in June that it was in the process of “identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam].” Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: “Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e).” The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word “perfluoroalkyl” or “PFAS” is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft’s flight operations and say that’s all you’re looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy’s study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual “events,” which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the

question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB.

(<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,"

(<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, [REDACTED]

Port Townsend, WA 98368

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; 2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 3. 2012 EA (26 Growlers including 5 from a reserve unit); 4. 2014 EA (Growler electronic warfare activity); 5. 2015 EIS discussing electronic warfare training and testing activity; 6. The current 2016-2017 DEIS (36 Growlers); 7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 19.a. Scope of Cumulative Analysis
- 19.b. Revised Cumulative Impacts Analysis
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 19.h. Cumulative Impacts on Biological Resources
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.d. Arrivals and Departures
- 4.a. General Noise Modeling
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 8.a. Cultural Resources Area of Potential Effect
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.j. City of Port Townsend Cultural Resources

know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are "no significant impacts." The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) "...does not allow an approach that would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact." The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is "turning out fully trained, combat-ready Electronic Attack crews." 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The "30-day waiting period" proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the



technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.”

(<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the “loser” among these communities. 8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, “[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to “identify the agency’s preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . .” Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative. 9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are “tiered” for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula. 10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the “Affected Noise Environment” around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy’s ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas. 11. The Navy’s claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the “library” of sounds that comprise the basis for the Navy’s computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS

that wildlife are “presumably habituated” to noise do not apply when that noise is sporadic and intense. 12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy’s benefit, but does not benefit the public. 13. The Navy’s noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software “...do not properly account for the complex operational and noise characteristics of the new aircraft.” This report concluded that current computer models could be legally indefensible.

(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term “event,” but does not define it. Therefore, the time, duration, and number of jets in a single “event” remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public’s ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service’s draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with “...opening day and associated opening weekend of Washington State’s Big Game Hunting Season for use of rifle/guns.” While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: “Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL.” This guidance further states, “Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure.” If this official guidance directs Growlers to fly

at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful. 20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. 22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant. 23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health

advisories for two PFCs, and the Navy announced in June that it was in the process of “identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam].” Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: “Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e).” The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word “perfluoroalkyl” or “PFAS” is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft’s flight operations and say that’s all you’re looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy’s study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual “events,” which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the

question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB.

(<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,"

(<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely, [REDACTED]

Shoreline, WA 98177

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP).

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

Shoreline, WA 98177

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious in their inappropriate use of 365-day averaging rather busy-day averaging.

- 1.a. Thank You
- 4.d. Day-Night Average Sound Level Metric
- 4.g. Average Annual Day/Average Busy Day Noise Levels

Shoreline, WA 98177

1.a. Thank You  
4.q. Potential Hearing Loss

The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined "hazardous noise zone" threshold (i.e., an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month).



Shoreline, WA 98177

The two most dangerous aspects of flying are the approach, landing and takeoff — in other words most of the OLFC flight path. The risks are significant (a) because of unrestrained and major encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of FCLP standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes exacerbated by the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs to a suitable 21st century off-Whidbey site.

- 1.a. Thank You
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children

Shoreline, WA 98177

1.a. Thank You

13.a. Environmental Justice Impacts

Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise.

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

Shoreline, WA 98177

Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the related past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of the impacted wells. Leakage of PFAS in storage or their use in a crash event is a hugely relevant environmental impact that must be addressed. And the public must be given the opportunity to comment.

Shoreline, WA 98177

- 1.a. Thank You
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects

The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the “percent probability of awakening for all scenarios...”

Shoreline, WA 98177

1.a. Thank You  
4.o. Classroom Learning Interference

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The EPA states, "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and reanalyzed.

Shoreline, WA 98177

1.a. Thank You  
4.q. Potential Hearing Loss

The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

Shoreline, WA 98177

The Navy has no right to spoil publicly held lands on the Olympic Peninsula by conducting war games and training in the Olympic National Forest with 5,000 "events" a year, with unannounced closures of the Olympic National Park in order to do mock warfare. These Growler planes can produce 150 decibels of sound, enough to cause instantaneous hearing loss. ( 110 db is the threshold for permanent hearing loss). In both humans and wildlife, effects from loud noise include hearing loss, increased stress hormones, cardiovascular disease, immune system compromise and behavioral impacts. WE OWN THIS LAND!

- 1.a. Thank You
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 4.m. Supplemental Metrics
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 7.d. Recreation and Wilderness Analysis and Study Area

Langley, WA 98260

Thank you for reading this. I am very concerned about the proposed increases in OLF field operations in central Whidbey Island. I am a farmer on South Whidbey and believe strongly in the necessity of having meaningful agricultural production throughout Whidbey Island. I have friends and fellow farmers in the Coupeville area who will find their quality of life and farming efforts severely threatened by the proposed increases, due to safety issues, private property restrictions and noise, air and groundwater pollution. In a time where we are all increasingly threatened by climate change, fossil fuel depletion and local and global infrastructure instability, it is important that we maintain and increase local and sustainable agricultural systems to ensure food security for now and the future. I am also concerned with the OLF operation's effects on wildlife, local economies and public safety. I know that there are reasons for the proposed changes, but please consider other options, from maintaining current levels of flights (preferable) to finding a more suitable location for these flights. Thank you, [REDACTED]

- 1.a. Thank You
- 1.e. Risk of Terrorist Attack
- 10.b. Biological Resources Impacts
- 12.e. Agriculture Analysis
- 12.n. Quality of Life
- 2.a. Purpose and Need
- 2.d. Program of Record for Buying Growler Aircraft
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife



Langley, WA 98260

To: EA-18G EIS Project Manager Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506 Hampton Blvd. Norfolk, VA 23508 Dear Sir/Madam, Thank you for extending the comment period to February 24, 2017, in order accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way. 1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant. Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because all flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects. 2. Impacts to cultural and historic sites are not adequately considered. The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx) ) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA). 3. Piecemealing projects to avoid analyzing cumulative effects is illegal. The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions: 4 squadrons of P-8A Poseidon Multi-Mission Aircraft; A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers); 2012 EA (26 Growlers including 5 from a reserve unit); 2014 EA (Growler electronic warfare activity); 2015 EIS discussing electronic warfare training and testing activity; The current 2016-2017 DEIS (36 Growlers); And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160. Therefore, it has been impossible for the public to know just

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 19.a. Scope of Cumulative Analysis
- 19.b. Revised Cumulative Impacts Analysis
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 19.h. Cumulative Impacts on Biological Resources
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.d. Arrivals and Departures
- 4.a. General Noise Modeling
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 8.a. Cultural Resources Area of Potential Effect
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.j. City of Port Townsend Cultural Resources

how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville alone went from 3,200 per year to a proposed 35,100 in 2017. That's more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are "no significant impacts." The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) "...does not allow an approach that would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact." The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability. 4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water. 5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is "turning out fully trained, combat-ready Electronic Attack crews." 6. The current comment period on a Draft EIS should not be the last chance the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The "30-day waiting period" proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts. 7. There are no alternatives proposed in this DEIS that would reduce noise. This violates NEPA §1506.1, which states, "...no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives." According to a memo from the President's Council on Environmental Quality (CEQ) to all federal agencies, "Reasonable alternatives include those that are practical or feasible from the

technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.”

(<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the “loser” among these communities. 8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative in the DEIS. According to the CEQ memo, “[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to “identify the agency’s preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . .” Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative. 9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010 with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are “tiered” for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula. 10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the “Affected Noise Environment” around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy’s ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas. 11. The Navy’s claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the “library” of sounds that comprise the basis for the Navy’s computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS

that wildlife are “presumably habituated” to noise do not apply when that noise is sporadic and intense. 12. Commercial airport noise standards should not apply to military jets because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy’s benefit, but does not benefit the public. 13. The Navy’s noise analysis does not allow for peak noise experiences, nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers. 14. The NOISEMAP software used for computer modeling is severely outdated, and a report from a Department of Defense commission concluded that noise measurements using this software “...do not properly account for the complex operational and noise characteristics of the new aircraft.” This report concluded that current computer models could be legally indefensible.

(<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>) 15. The Navy describes its activities using the term “event,” but does not define it. Therefore, the time, duration, and number of jets in a single “event” remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public’s ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them. 16. New information that was not disclosed in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service’s draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with “...opening day and associated opening weekend of Washington State’s Big Game Hunting Season for use of rifle/guns.” While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control. 17. Low flights will make even more noise than before: While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: “Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL.” This guidance further states, “Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure.” If this official guidance directs Growlers to fly

at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed. 18. Sound levels for these low flights are not listed in the DEIS: Table 3.1-2, titled "Representative Sound Levels for Growler Aircraft in Level Flight," on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets. 19. No mitigation for schools: The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, "...but may be developed and altered based on comments received." Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be "...identified in the Final EIS or Record of Decision." Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy's proposal to not allow a comment period on the Final EIS would be unlawful. 20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period. 21. Crash potential is higher: With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable. 22. Contamination of drinking water in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, "No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft." While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant. 23. Navy knew about contamination in advance: It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls "historic" use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health

advisories for two PFCs, and the Navy announced in June that it was in the process of “identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam].” Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: “Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e).” The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word “perfluoroalkyl” or “PFAS” is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals.

(<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>) 24. No mention of contaminated soil is found in the DEIS: It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water. 25. Impacts to wildlife have been piecemealed: It does not make sense to separate impacts from just one portion of an aircraft’s flight operations and say that’s all you’re looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy’s study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual “events,” which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted. 26. Pages of boilerplate language do not constitute analysis of impacts to wildlife: Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the

question: if the scope of this DEIS measured the true impacts of jet noise, it is highly likely that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area. 27. Old research cited but new research not: In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB.

(<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called "Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,"

(<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the best available science. This DEIS fails that test. Thank you for considering these comments. Sincerely,

Langley, WA 98260

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP). The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather than busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance. The DEIS claim that the JGL noise study was “flawed” is disingenuous and unsupportable, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data. The DEIS misconstrued an important finding of the National Park Service’s 2015 noise study at Ebey’s Landing Historic National Reserve and obfuscated a forthright analysis of the impacts on visitor experience. That misconception has to be credibly revised to properly characterize the real impacts. Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature. The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy’s defined hazardous noise zone threshold (i.e., “an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month”). Island County land-use policies, plans, as reflected by the construction permits issued, have largely defied the Navy’s 2005 AICUZ directives for Outlying Field Coupeville, such as no residences in a noise zone 2. Whether due to willful intent to ignore by the County or to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and attendant land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should be immediately advocating to the County to place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved. The two most dangerous aspects of flying are the approach, landing and takeoff -- in other words most of the OLFC flight path. The risks are significant (a) because of significant encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes with the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs off a suitable 21st century off-Whidbey site. Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise. Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 13.a. Environmental Justice Impacts
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.e. Field Carrier Landing Practice Patterns
- 3.f. Field Carrier Landing Practice Operation Totals
- 3.g. Field Carrier Landing Practice Evolutions and High Tempo
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.j. Other Reports
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.d. Environmental Health Risks and Safety Risks to Children
- 7.c. Noise Disclosure



at OLFC. The DEIS, however, dismissed addressing the past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of these wells. Leakage of PFAS in storage or use in a crash event is a hugely relevant environmental impact must be addressed and the public must be given the opportunity to comment. The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% overestimated use of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected. The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the "percent probability of awakening for all scenarios..." While music torture is still permitted under US law, the United National Convention against Torture defines torture as "any act by which severe pain of suffering, whether physical or mental..." Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations. The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and analyzed. The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated. The DEIS fails to adequately address the effects of high noise levels during pregnancy provoking significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss. Citizens of Ebey's Reserve <http://citizensofebeysreserve.com>.

1.a. Thank You

Oak Harbor, WA 98277

Keep up the good work in keeping our flight crews sharp.

Lopez Island, WA 98261

The Naval Air Station's largest program—training pilots to fly "Growler" aircraft—has exposed more than 11,000 residents to harmful levels of noise. An economic assessment model used to assess every high-noise project in the United Kingdom suggests that the health costs to Island County residents are currently \$2.8 million per year, and will grow to \$3.3 million if the Growler program expands as planned. Additionally, the program has depressed property values by \$9.8 million thus far, and this damage will almost certainly grow as that program expands as planned. The Draft EIS at 3-22 states "No studies have shown a definitive causal and significant relationship between aircraft noise and health. Inconsistent results from studies examining noise exposure and cardiovascular health have led the World Health Organization (WHO) (2000) to conclude that there was only a weak association between long-term noise exposure and hypertension and cardiovascular effects." The Draft EIS does not utilize sufficient science to explore health effects in terms of human health and the costs of the consequent health care. The Draft EIS should provide a deeper analysis of the effect of the additional growler jet noise, fumes from the jets and the chemicals used at NASWI for maintenance.

- 1.a. Thank You
- 12.b. Invisible Costs
- 12.j. Property Values
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests

Lopez Island, WA 98261

1.a. Thank You

4.f. Noise Measurements/Modeling/On-Site Validation

Decibel levels from growler jet noise have been recorded in local homes as high as 124db. Evidence of actual noise levels is ignored in the Draft EIS. The Draft EIS should include actual noise levels from current and additional Growler jet activity.

Lopez Island, WA 98261

- 1.a. Thank You
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process

The Draft Environmental Impact Statement (EIS) is deficient in not addressing 40 additional Growlers that are in the process of delivery beyond the 35 or 36 identified in the Proposed Action. The Draft EIS states that The Proposed Action would: • continue and expand existing Growler operations at the Naval Air Station Whidbey Island complex, which includes field carrier landing practice by Growler aircraft that occurs at Ault Field and Outlying Landing Field Coupeville • increase electronic attack capabilities by adding 35 or 36 aircraft to support an expanded U.S. Department of Defense mission for identifying, tracking, and targeting in a complex electronic warfare environment The Environmental Impact Statement evaluates the potential environmental impacts associated with the following resource areas: airspace, noise, safety, ... , as well as the cumulative impacts of the Proposed Action and other local projects. [emphasis added] The Draft also states that the total number of Growler Aircraft at Ault Field will be 117 or 118. A Department of Defense (DoD) report from 2016 states The procurement profile of the FY 2017 PB adds 7 EA-18G aircraft in FY 2016. The result of this addition will be a FY 2016 FRP contract for Lot 40 EA-18G aircraft, which increases the total Program of Record (PoR) from 150 to 157. ... These aircraft are in the process of delivery ... . Initial aircrew training will be conducted at NAS Whidbey Island, WA. ... Limited I-Level for some EA-18G and F/A-18E/F common maintenance tasks has been established at Whidbey Island, WA. Airborne Electronic Attack (AEA) I-Level maintenance will be stood up at Whidbey Island and aboard the CVWs commencing FY18. It is clear from the DoD report that 157 Growlers will be based at NASWI at times, not 117 or 118 as described in the Draft EIS. The additional 40 Growlers are part of the same mission and are “in the process of delivery.” The Draft does not acknowledge the additional 40 Growlers, describe what activity they will undertake or analyze how that activity will impact the affected environment. For example, will maintenance engine run-ups be conducted on the additional Growlers? References are: Environmental Impact Statement for EA-18G “Growler” Airfield Operations at Naval Air Station Whidbey Island Complex Volume 1, pg. Abstract-1 *ibid*, Table 2.3-1 Selected Acquisition Report (SAR), RCS: DD-A&T(Q&A) 823-378, EA-18G Growler Aircraft (EA 18G), As of FY 2017 President's Budget, March 17, 2016, pg. 7. <https://goo.gl/IQrY4K> *ibid*, pg. 37 The Draft EIS has not fulfilled its obligation to “evaluate[s] the potential environmental impacts ... as well as the cumulative impacts of the Proposed Action and other local projects.” Council on Environmental Quality (CEQ) Regulation 1502.9 states (c) Agencies: (1) Shall prepare supplements to either draft or final environmental impact statements if: (i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or (ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts. RECOMMENDATION: Supplement the EIS to address the 40 additional Growlers to be stationed at NASWI and allow further opportunity for public comment before the Final EIS is prepared.

Navy Draft EIS comments  
NAS Whidbey

Prepared by [REDACTED]  
Lopez Island, WA 98261  
January 16, 2017

To: A-18G EIS Project Manager, Naval Facilities Engineering Command  
(NAVFAC) Atlantic – Attn: Code EV21/SS, 6506 Hampton Blvd., Norfolk,  
VA 23508

The following comments are addressed to the U.S. Navy Environmental Impact Statement (EIS) draft issued November, 2016, regarding a proposed action of adding additional EA-18G Growlers and increasing Airfields Operations at Naval Air Station (NAS) Whidbey Island and OLF Coupeville.

In the Draft EIS, claims are made about the impact of jet noise. Though requested in the Scoping process to use ACTUAL noise measurements, the Draft EIS continues to rely on averaged noise. The ear does not hear averaged noise. The body does not feel the impact of averaged sound waves/noise. (pages 3-16 and pages 4-20)

Thus the Draft EIS ignores data which makes its observations inadequate and unsubstantial. The impact on local communities is underestimated.

**\*The EIS should include actual noise measurements.**

**\*The Draft EIS should consider reports such as those produced on the San Juan County Noise Reporting website. <http://sjcgis.org/aircraft-noise-reporting/>**

The most recent summary of the data produced from that website is enclosed.

The raw data can be found at:

[http://data.sjcgis.org/datasets/30e08036e4f4463dabe19bc98d6c9b81\\_0](http://data.sjcgis.org/datasets/30e08036e4f4463dabe19bc98d6c9b81_0)

- 1.a. Thank You
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports

# Jet Noise Reports, January 2015 - December 2016

Data gathered from reports filed on the  
San Juan County Jet Aircraft Noise Reporting website

<http://sjcgis.org/aircraft-noise-reporting/>

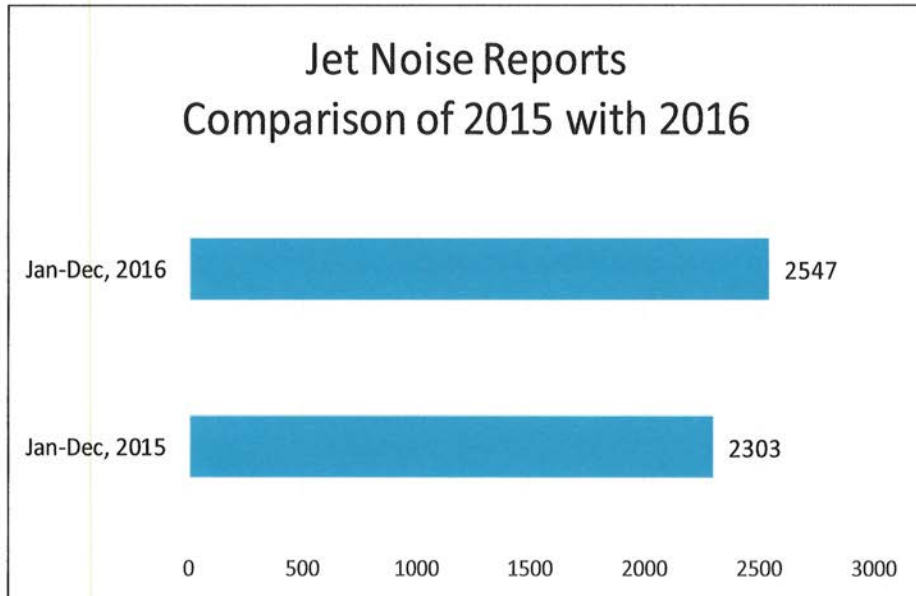
- ⇒ Total reports for 2015 and 2016
- ⇒ Loudness Reports
- ⇒ Reports of Noise by Hour of the Day
- ⇒ Reports by Month
- ⇒ Sample of recent comments submitted with each report

**The number of Jet Noise Reports for 2016  
is 10.5% higher than 2015.**

Reporting began on May 15, 2014; data has been analyzed since January 2015. Users of the website enter type of loudness, date, time, comments, aircraft type, etc. Due to the variety of devices used to submit data (e.g. desktop, laptop, I-pad, smartphone), data such as time of day can be recorded differently. Efforts have been made to standardize data. This report is compiled monthly; some monthly data may change in subsequent months due to late reporting which is not captured until the following month. Errors in totals are estimated to be less than half a percent.

*Special Note:* A number of comments reveal multiple incidents of jet noise, but the report is only counted once. Thus, the noise incidents are larger than the number of reports.

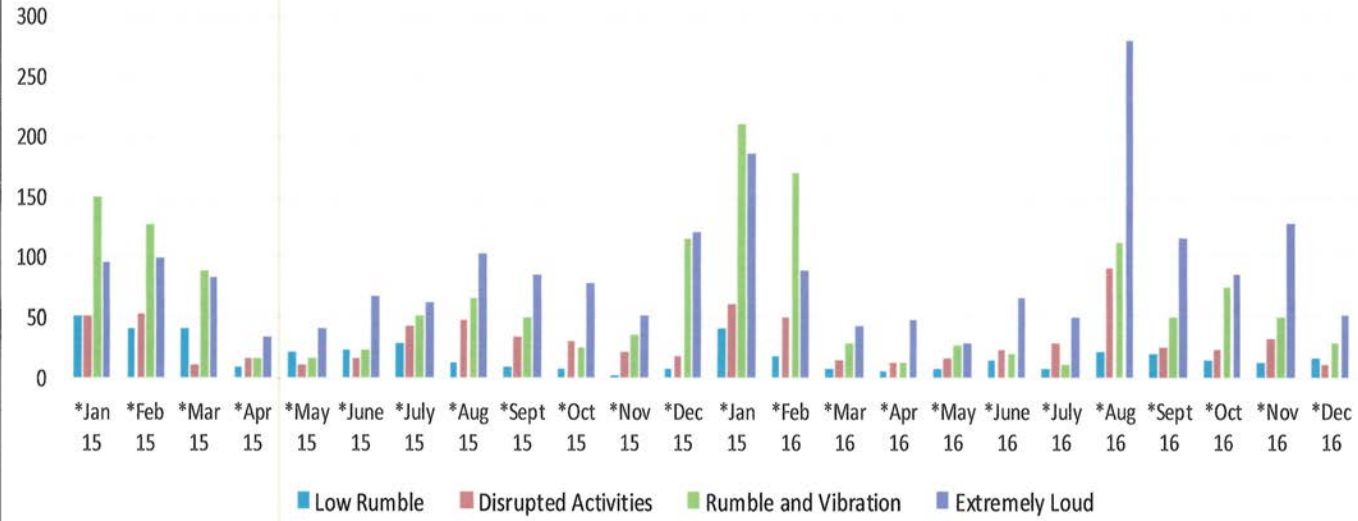
The San Juan County Jet Aircraft Noise Reporting website was developed and approved by the County to enable San Juan County residents to have a reliable source for recording and tracking their comments and complaints about jet noise from Naval Air Station Whidbey Island

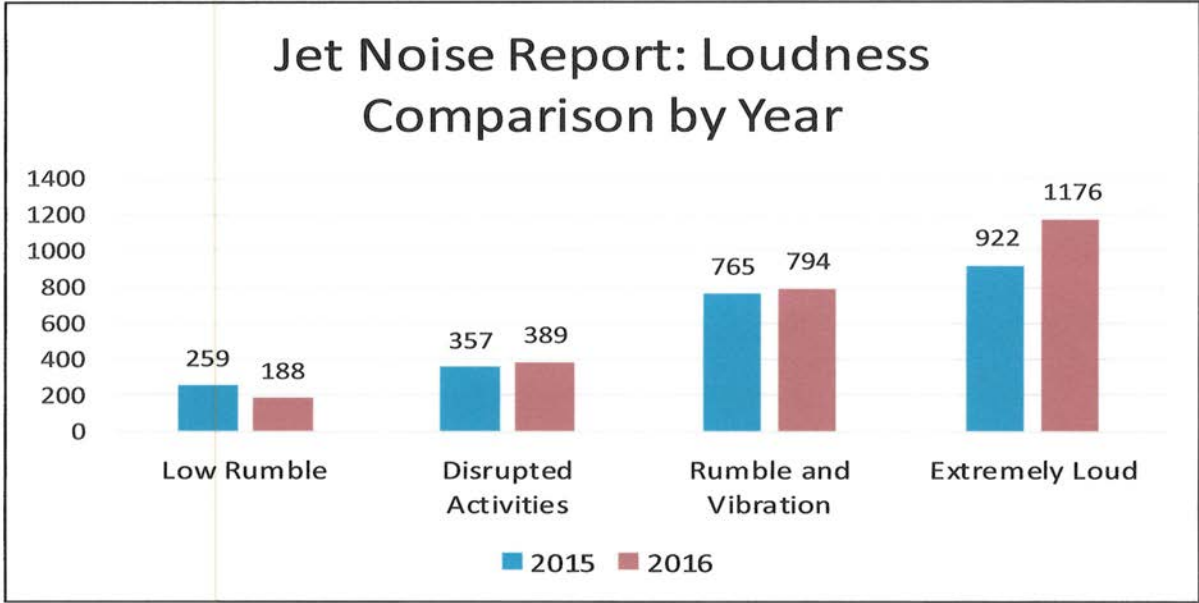


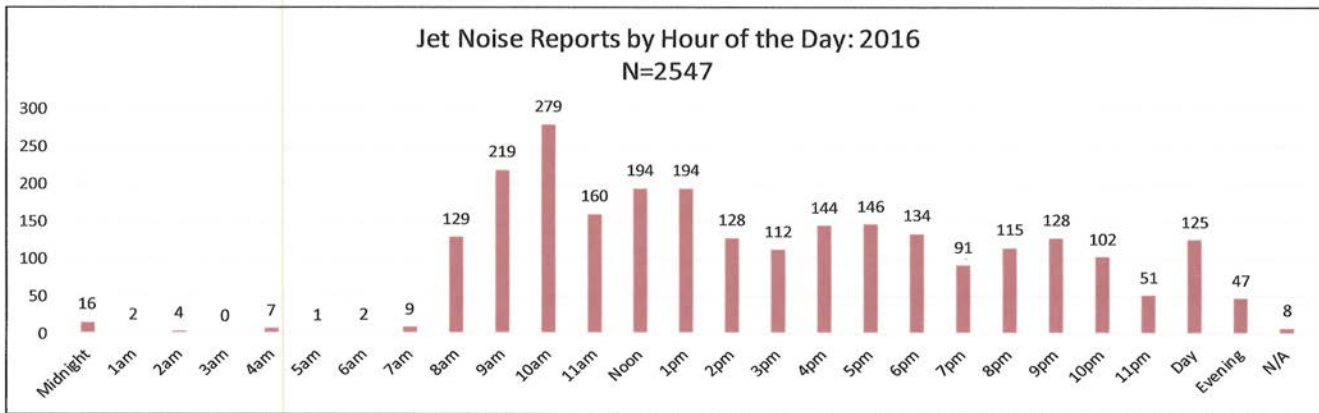
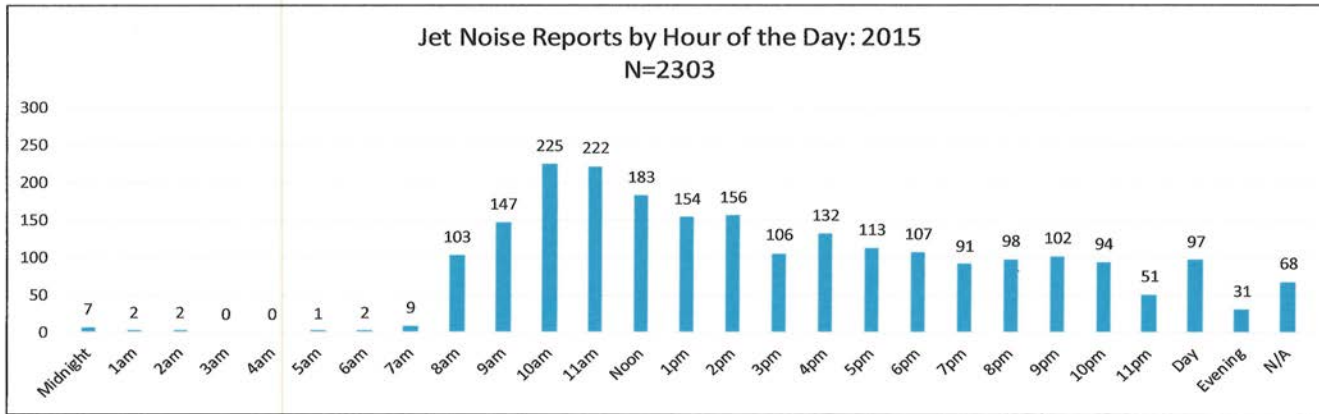
**The number of Jet Noise Reports for 2016 is 10.5% higher than 2015.**



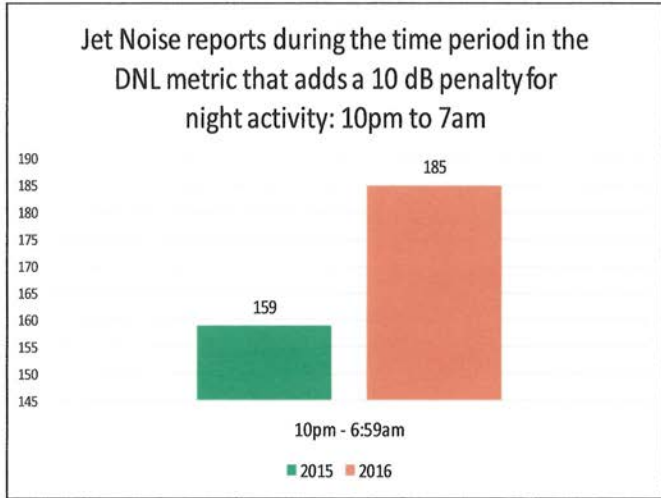
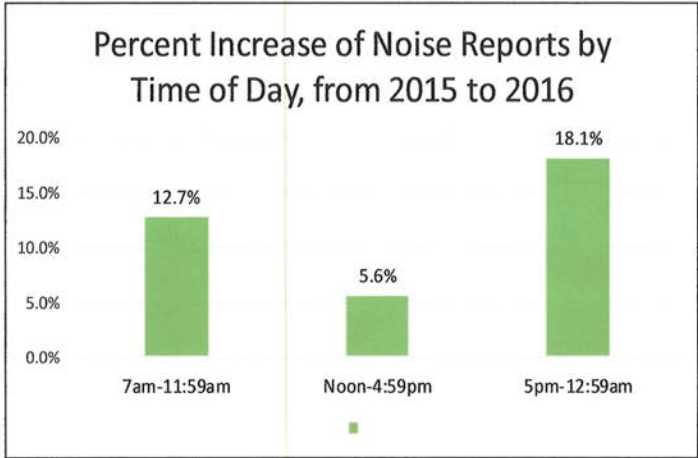
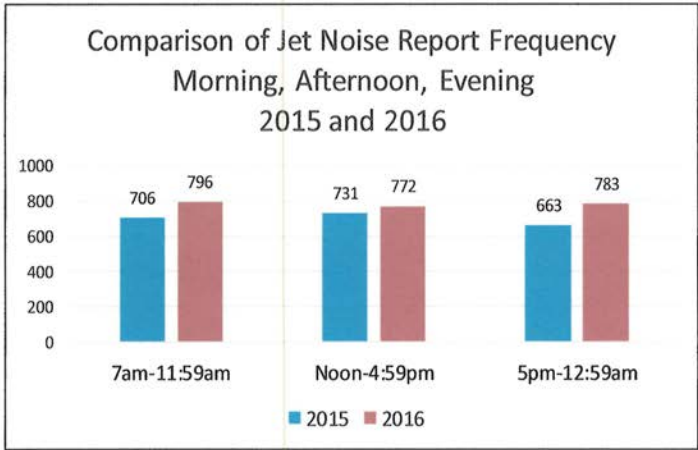
## Jet Noise Report: Loudness 2015 and 2016



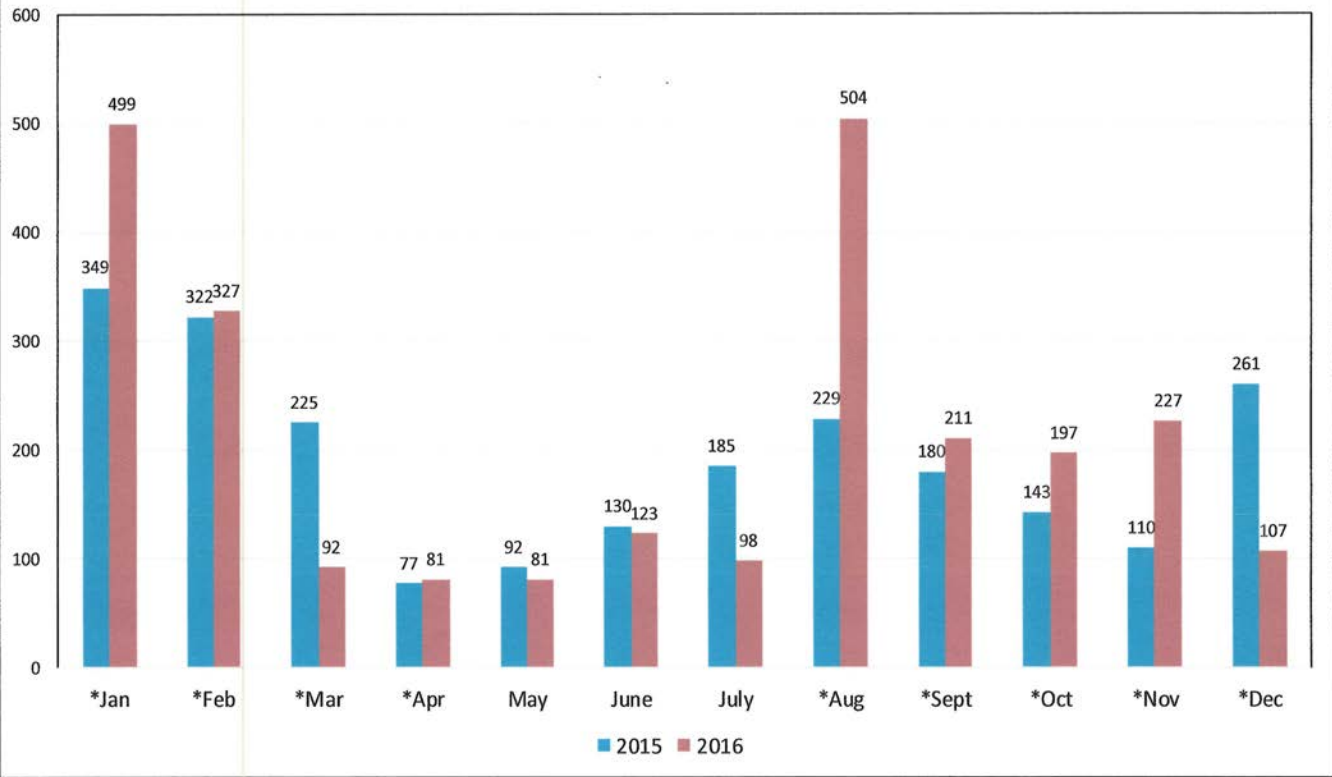




For example, reports submitted from 11:00 am through 11:59am are clustered in the 11 o'clock hour. Some reports do not include a specific time. For those, related data may indicate Day or Evening. In some cases, time of the noise event cannot be discerned and is recorded as N/A.



Jet Noise Reports by Month: 2015 and 2016



Comments Submitted with December 2016 Reports.

Very loud low flying plane headed north north-east as I walked on DNR & Park land. I had to put my hands over my ears, but it was still a terrifying noise. Why is our government doing this to us?

Very loud jet above our home. Too many clouds but it had all the sounds of a Growler. I was outside and had to cover my ears.

Is this the Growler doubling back over my home, or just circling? LONG LONG LOUD LOUD roaring above. Cloudy, so cannot see. Had to run inside to escape the roaring.

Too much jet noise in the skies. Hardly ever a quiet moment it seems. Always feeling like there's a war on.

Walking - hopefully before the Growlers are up 76.5dba

Still walking - another huge blast

Fixing dinner for friends - a huge BLAST. 76.1 INSIDE

Painful. Awful. Shakes the house. Not even gales shake this house. Feel it as much as hear it. Makes my inner ear feel as if it's imploding.

Loud jet noise, interrupted a conference call.

Jarring Blasts. Definitely Growlers. Measured inside roughly 68.9dBA

Loud jet noise. Fortunately I wasn't on a call or teaching.

12/12 to 12/16 The engines were rumbling - super loud and disruptive. At times ear splitting loud and bodily painful. This went on all week long. I am on a construction site so no time to record each one but overall it was very disturbing.

Loud jet noise

Loud jet noise. Fortunately I wasn't trying to have a conversation

Noise has been intermittent and consistent since early morning

Does anyone in the Navy or Congress understand that when you live in a QUIET area 35-40dBA and then you are blasted with 65.7dBA repeatedly, your body reacts. Adrenalin happens. Heart races. It's automatic. This is an invasion of home!

2hrs intermittent

Jets are roaring overhead. Growlers by their deep sound. Cloudy. Noisy ALL DAY!!!!

Here is ANOTHER Loud jet roaring over us. Why fly over Lopez? WHY???? Just touring? On my tax dollars?

Roar and Vibrations AGAIN. We leave Lopez in 2 days, and I am happy about that. It means NO GROWLER jets to disturb us for 2 weeks. Sad that one has to leave home in order to feel good. Lopez is a Navy war zone.

Just had another jet roar and vibration rattle my home and my bones. This has been almost continuous. Wish I could leave, but I have work to do here.

Annoying

Jet noise basically all day. I'm just lucky I wasn't teaching today, or my students would have been PO'd!!

Rumble

Trying for a quiet dinner by the water. Had to give it up - too noisy.

Night

Very very loud and disruptive

How is this legal? This noise and shaking is completely disruptive and shatters ALL peace.

Rumble

There's a deep rumble that vibrates our house despite the closed windows, heater and wind outside.

terrible rumble frequently through day

63.2dBA, 67.2dBA inside the house

Low flying Growler aircraft

Flying on Saturday! Weekend warriors? LOUD!!!!!!

Low flying aircraft

Couple of jets so far this morning. I thought they were off this week! Interrupted work - I was recording audio.

66.4dBA and 69.6dBA

At the Anacortes ferry dock. Very disturbed by LOUD jets flying above. Due to cloud cover I could not see them, but they had the signature C-growl of the growler. Extended roaring.

House is shaking. Bones are rattling. Head feels as though it is being pummeled. The vibrations are like shock waves, they affect the whole body. AWFUL.

Did the Trout Lake Dam burst? Is there a chimney fire? Are we having an earthquake? No, it is the reassuring sound of freedom

Incredible shrieking and roaring jet is zooming somewhere overhead. I am inside, not looking outside, but the jet scream obliterates all other sounds in my home. So startled that I jumped up thinking a jet was crashing.

Growler flying E to W, gear down, 1500 -2000 feet, over S. Lopez. HUGH NOISE

Too much jet noise coming from Whidbey this afternoon. Doors and windows are closed, and the TV is on, yet the whole house is filled with jet roaring. The growler jets are NOT APPROPRIATE for this area. The Navy does NOTHING to mitigate the noise.

Suddenly a whole lot of roaring going on in the skies. I can hear it inside above all the household sounds. Suddenly distracted from conversation to see if something was wrong outside. Opened the door and knew it was jet roaring noise.

Lots of jet noise overhead today. Too cold to be outside, but the roaring came right into my home. No escape. Signature growler long and drawn out deep roar. Go bother someone else!

There goes ANOTHER loud jet, disrupting the typical sounds of our household. These growler jets are too loud and they should not be flying over populated areas.

The Navy is assaulting us with jet roarings that vibrate through our home. Another one just rumbled. It has been constant today. Very disturbing. Feels uncomfortable to feel the floor vibrate.

4:42pm. Big roars and vibrations coming from Whidbey - like the one NOW - threaten to disturb dinner party.

And here is ANOTHER loud jet rumble shaking our home. Been going on all day. Very annoying to be shaken.

ROARING, RUMBLING AND VIBRATIONS CONTINUE TO BLAST OUT FROM WHIDBEY. NAVY IS AN AWFUL NEIGHBOR.

Loud jet roaring in the skies is penetrating into my home. Jet roaring from Whidbey pollutes our environment.

Just got hit by a wall of noise, and vibration from Whidbey. Sitting at my computer, the vibration comes up from the floor to my feet and body. This is NOT GOOD.

ANOTHER roar and vibration from Whidbey. Is this going to be ANOTHER miserable day thanks to the arrogant Navy?

The jet roaring continues this morning. Blasting thunders that come from Whidbey and hit our home.

Thunderous walls of jet blasts seem to be coming consecutively now Vibrating our home and through us.

The roars and vibrations of jets from Whidbey (taking off?) are now coming one after another. The assault is apparently on.

The jet thunder keeps coming from Whidbey this morning. The Navy needs to accurately measure the noise from these jets. There is certainly a serious impact.

Flights all morning, but this one was particularly disruptive.

Not only are we disrupted with jet take-off vibrations, but we now have jet noise filling the skies as they roar around. Impossible to be outside.

"9 Growlers were heard in one hour. This is 30 kms from the military airport.

This is a horrible airplane. Where does this data go? I the delete basket?"

Huge jet roar just now....along with this whole day of wall after wall of jet noise. 4:11pm. I am having company for dinner. Will it be disrupted by this jet noise that invades our home?

4:38pm. Just got hit by another jet roar and vibration. ALL DAY. Horrible day, courtesy of the Navy.

The jet roaring in the skies is just about continuous now. There is no peace inside or outside. The noise comes right into our home.

This has been a noisy and disturbing morning, filled with jet roaring, and as currently, jet noise filling the skies as they roar around. I am distracted,

because I never know if it is a car driving up, or whatever, or JETS. So I am distracted.

My day to monitor the National Monument lands at the marsh. constant Blasting - extremely loud. Encountered a visitor - they were incredulous that this kind of noise was allowed - that people have to live with this.

Jet roaring fills the sky. Very noisy. Heard inside even above normal household sounds. Nosier than the dishwasher.

Rumbling since 10am loud bursts overhead intermittent

Noisy day today from the Navy. Just now we got hit with another jet roar overhead. The noise comes right into the house even though we are 14 miles from Ault.

Just experienced a terrific roar and vibration shuddering through the house. Very long shudder. What is going on? Why are there such jets in this populated area?

Not sure what that was but it sounded like a freight train through the front yard. Realize it is part of the jet noise today. An awful day of noise.

There are now ROLLING thunderous roars and vibrations coming at us. This has been intense and constant since this morning. The Navy must be at war and we are the enemy.

Ground rumble this afternoon. Rattling window panes. Disruptive to computer work.

1:47pm. Incredible vibration, and huge long roar is shaking our home. Jet engines at Whidbey disturbing us. It has been like this all day.

I have been hearing these Growlers all morning. Terrible. Get some noise suppression devices installed immediately. Terrible neighbors!

Just felt another vibration from jet activity on Whidbey. It has been almost NON-STOP today. The growler jet is NOT appropriate for this area. It is too loud. The Navy refuses to measure the noise because they know it is excessive.

69.9dBA in the house

a few more days of intermitant disturbance . We hear you , Do you hear us?!!

A lot of jets roaring around in the skies. Very noisy and annoying outside.

All of the sudden a HUGE roar, like a tornado I imagine, sweeps through the air. A big jet roar.

Growlers flying over our home so loud I can't hear my music ☹

Sounds like we have a bunch of jets sweeping overhead. That is what it sounds like. Like a hurricane is going on outside. GO AWAY!

Too much jet noise tonight. The jet roaring comes straight into our home.

I am very distracted by all the jet noise going on outside. It sounds like we are living next to the truck lane on I-5. The noise comes right into our home. The Navy is an awful neighbor.

Jet roaring overhead. Flying too low. Incredible roaring wall of noise blots out all other sounds of conversation.

Loud jet noise

more noise....

Loud jet noise, fortunately I was not on a call!

Enjoying our hot tub watching the stars when a growler blasts over shaking the deck and totally drowning out the hooting of the owls ☹☹ and sparkling of the winter night sky. Shame on you Navy.

I have heard Growlers earlier this week as well but have not reported them.

Pretty steady noise and blasts ranging from 59dBA - 73dBA. Forget having a peaceful dinner - or a peaceful anything.

The Navy day begins - two giant BLASTS

Loud rumbling from base, followed by an extreme aroma of burning kerosene. The fumes were strong enough to be slightly nauseating. Three people present and can confirm.

Off and on throughout most of the day.

A few of these this afternoon. Not too disruptive as I had no calls and wasn't teaching this afternoon.

Steady roars, overflights and BLASTS- 8 different measurements ranging from 60.1dBA - 76.8 dBA in the house

Jets all day -- too many to report individually.

Disrupts normal activity. Have to wait to resume talking and hearing.



Hideous noise day ranging from 61.4dBA - 87.9dBA in the house. Pretty steady roars, and Blasts. Our legislators should be ashamed.

frequent disturbing roars and vibration. Inescapable repeated assaults

Pretty steady Roaring and Blasting - a few precious moments of quiet and then overflights and ear splitting noise returns.

roughly 67.6dBA in the house. So hard to concentrate on work.

Working outside. Jet noise louder than the chain saw - not all the time - but enough that it feels oppressive even wearing ear protection. Why is it right to create a war zone over our homes?

Horrible loud noise.

Overflight of 2 Growlers - estimate 2000 feet headed S. - EXTREMELY LOUD.

Lopez Island, WA 98261

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports

Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.

Lopez Island, WA 98261

- 1.a. Thank You
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Lopez Island, WA 98261

2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified. ACTION: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region. 3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide “scientifically and legally defensible noise assessments” of the modern, high-thrust jet engines used in the Growlers. ACTION: Redo the noise simulation using the more recent Advanced Acoustic Model. 4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days. ACTION: Noise levels should only be averaged over active flying days. 5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive. ACTION: Recognize the health impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe." 6. The Draft includes some independent noise measurements and ignores others. ACTION: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis. 7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument. ACTION: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA. 8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing. ACTION: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training. 9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI. ACTION: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties. 10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment. ACTION: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision. 11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states “If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.” ACTION: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.

1.a. Thank You

12.a. Socioeconomic Study Area

12.h. Tourism

2.c. Compliance with the National Environmental Policy Act

2.e. Public Involvement Process

2.k. Range of Alternatives

2.n. Alternatives Considered But Eliminated

4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources

4.c. Advanced Acoustic Model

4.d. Day-Night Average Sound Level Metric

4.f. Noise Measurements/Modeling/On-Site Validation

4.g. Average Annual Day/Average Busy Day Noise Levels

4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations

4.j. Other Reports

4.r. Nonauditory Health Effects

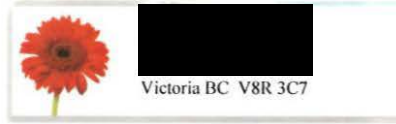
4.t. Noise Mitigation

7.h. San Juan Islands National Monument

Lopez Island, WA 98261

1.a. Thank You  
4.j. Other Reports

The Draft includes some independent noise measurements and ignores others. We have asked that the EIS refer to the data generated by the San Juan County Noise Reporting Site. The EIS SHOULD ASSESS Noise impact data from that website. That data can be found in two web locations: 1) [http://data.sjcgis.opendata.arcgis.com/datasets/30e08036e4f4463dabe19bc98d6c9b81\\_0](http://data.sjcgis.opendata.arcgis.com/datasets/30e08036e4f4463dabe19bc98d6c9b81_0) and 2. <http://www.quietskies.info/county-website-data-summaries>



1.a. Thank You

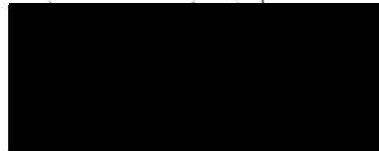
Dec. 3/2016

Project Manager  
Naval Facilities  
Engineering Command  
Dear Sir,

I am against any Growler jets  
desturbing Victoria, any more would be  
not acceptable.

People here can hear and  
feel the take off and landing of your  
jets.

Yours truly



1.a. Thank You

Seattle, WA 98115

As a part-time Lopez Island resident and homeowner of course I want quiet. In exchange for my luck in having a home in a beautiful place I can live with the Navy's noise. We need a navy. The Navy needs to practice. When I bought my home I knew the Navy was nearby. I'll put up with some occasional deep rumbling

1.a. Thank You

Oak Harbor, WA 98277

Keep OLF!



1.a. Thank You

Oak Harbor, WA 98277

Keep the Whidbey Island OLF

Coupeville, WA 98239

The Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station, Whidbey Island Complex, fails to provide adequate analysis of the proposed actions in many ways, and is deeply disappointing as a product of a government agency, which should be promulgating a balanced analysis of all the relevant issues, to arrive at a decision which optimizes the public good. As an architect, I have been involved in many EIS processes, and have seldom seen one where the alternatives considered were so narrow, nor where the methodologies and analyses utilized were so inadequate. I don't have time to rant about all the problems with this report, but will confine myself to what I see as the most important methodological failings.

1. An inadequate consideration of the possible range of real alternatives. The "No Action" Alternative is proposed as the baseline to which all other alternatives shall be compared. However, if the purpose of an EIS is to evaluate changes in impact based upon proposed actions, this baseline alternative is extremely biased, as it presupposes, and refuses to take into account, two fundamental changes that have already taken place:
  - The change from EA-6B "Prowlers", to EA-18G "Growlers", with a consequent increase in noise levels.
  - An increase in the number of FCLPs being flown at the Coupeville OLF over the past decade. The residents of Coupeville are not concerned solely with the additional increases being proposed - we are concerned with the actions that have already taken place without adequate review or even notice. The adoption of this No Action baseline implicitly builds these changes into the proposals, when it should establish a baseline in the period before these unannounced changes were implemented. The three alternatives presented actually represent a very narrow range of solutions - all propose adding 35 or 36 EA-18Gs at Whidbey NAS, and all propose a massive increase in the number of FCLPs to be flown in the Central Whidbey area. From the perspective of an area resident who will be impacted by these proposed actions, there is no real discernable difference among the Three Alternatives, when actual alternatives that would change the impact are blithely ignored. A more reasonable range of alternatives to be considered would include:
    - Base case: 3500 FCLPs per year, flown by EA-6B Prowlers.
    - Alternative A: Evaluate the impact of the existing squadron configuration of Growlers at Whidbey NAS, with any new squadrons to be based at other Naval Air Stations.
    - Alternative B: Increase the number of Growlers at Whidbey NAS by the proposed 35 or 36, with all FCLPs to be flown at a remote location, such as a field out in the eastern Washington desert.
    - Alternative C: Increase the number of Growlers at Whidbey NAS by the proposed 35 or 36, with all FCLPs to be flown at Whidbey NAS, and none to be flown at the Coupeville OLF.
    - Alternatives D through X: all alternatives which have Growler FCLPs at the Coupeville OLF.
2. Dependence upon hypothetical computer modeling and generalized research results when actual, local data is available. In its consideration of the impact of the proposed alternatives, the EIS relies upon computer models and generalized (and often extremely old) research, when in fact, real-world, on-the-ground data is available, or could be easily obtained. As someone with long-standing experience in the areas of building performance and energy evaluation, I fully understand the inadequacies of computer modeling. Computer models are useful when trying to predict future performance, because they are the best tools we have. However, although these tools are often refined through comparison with actual test data, they can never hope to

- 1.a. Thank You
- 12.j. Property Values
- 12.n. Quality of Life
- 2.k. Range of Alternatives
- 2.l. No Action Alternative
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.m. Supplemental Metrics

measure performance with the accuracy of real-time data collection; reality is always more complex than the models. Whenever possible, decisions should be made upon facts not projections - why would you trust a computer model to predict energy consumption when you have a year's worth of utility bills to examine? Yet this EIS fails to examine data that is readily available. Noise levels: Test data on the noise output of EA-18Gs is extrapolated and used to generate the DNL contours for the areas surrounding the NAS and OLF, as if some hypothetical Growlers were to arrive at some point in the future. But the Growlers are already flying in those locations, very frequently. Why not use the field measurements that have already been compiled by consultants, or even better, use the resources committed to the EIS process to compile an exhaustive set of measurements spread throughout the area? Another way in which the sound level modeling is inadequate is the generation of DNL contours at various distances from the aircraft flight path, based upon "level flight". (Table 3.2.1). But it is obvious that level flight only occurs at the OLF as the aircraft approach the field, and as they fly south for another approach. When the Growlers turn towards the west over Coupeville, they are banking steeply, and projecting noise towards the town, not down at the ground. Even assuming that the computer models accurately predict noise dispersal during level flight, this is wholly inadequate for predicting sound levels during these turns. Again, why not monitor actual sound levels during FCLPs? Another area in which the reliance on computer modeling is completely ridiculous is in the impact of noise upon real estate values. The EIS cites research (some dating back to the 1970s!), and arrives at an inconclusive estimate on a vaguely defined, wide range of possible effects. Yet we have what economists call a "natural experiment" right in front of us. It should be easy to compare recent property value changes in those areas already impacted by increased Growler FCLPs and noise to similar areas without Growlers. As I don't have time to do the necessary research to come to a rigorous conclusion, I can only offer anecdotal, yet clear evidence: in 2016, while home prices in the Puget Sound region increased an average of 12%, and home prices in Island County as a whole increased an average of 15.9%, the assessed valuation on our house in Coupeville rose 1.5%. While real estate values in Washington State have now exceeded the level reached before the Great Recession, the valuation of our property in Coupeville is still 21% below that peak level. (This period of property value stagnation almost exactly coincides with the period in which Growlers replaced Prowlers, and the number of FCLPs at the OLF quadrupled, before rolling back to merely doubling.) A comparison could be easily made between the changing valuation of properties in Coupeville, a historic town heavily impacted by Growler noise, and Langley, another historic Whidbey Island town not impacted by Growler noise. I am sure the difference in the change in values would be striking, and I am perplexed as to why such an obvious and relatively straightforward comparison was avoided, in favor of generalized arguments and vague research. The current impact of actual Growler noise could be ascertained, and perhaps computer modeling could then be appropriately used to extrapolate from this data, to estimate future impacts of increased FCLPs.

3. Inadequate models and standards that do not represent the reality of the environmental impact

The almost-exclusive use of the Day-Night average sound Level (DNL) to assess the noise impact upon residents is fundamentally flawed. We don't experience sound as an average, we experience it as a discrete, short-term effect. Measurements that average discrete data points distort reality in absurd ways: the average income for ten households is \$50,000 if all households earned that much, but also if one household earned \$410,000 while the others each earned \$10,000. The impact of a punch in the face is

quite different from the total impact of 100 caresses. When analyzing building energy performance, we look at both instantaneous loads (amount of energy needed to heat a building at "design" loads, or the coldest likely conditions), and total annual consumption - adding together all those individual demands to calculate total energy usage for the year. These two metrics are quite distinct, and are used for very different purposes - one to size the equipment, the other to estimate overall consumption and efficiency. The DNL combines these two separate approaches in a very stupid manner, taking a series of individual events (design loads) then averaging them over the whole year. The building analogy applies perfectly here: if the winter design low temperature is 40 degrees, and the summer design high temperature is 105 degrees, they average 65 degrees, which is a perfectly comfortable temperature. By the logic of the DNL, we shouldn't need a furnace, nor should we need an air conditioner, since the average temperature couldn't be better. This is not at all how we experience noise. When a Growler is screaming overhead at midnight, keeping everyone in our house awake, it is small comfort to know that it will be quiet at 9:00 the next morning. One last, personal note: ten years ago we decided to build a small house in Coupeville, intending to retire there in the near future. Coupeville is the center of Ebey's Landing National Historical Reserve, an extraordinary natural and cultural area. One of the main appeals was knowing that this area was part of the National Park Service, would not be subject to the sprawling development that has compromised so much of the region, and would not fundamentally change. We are now confronted by the Navy's actions, which have already rendered parts of the town unlivable, and which will completely devastate the place if the further proposed actions are carried out. We will have to leave the town (and the state), and will lose a lot of money in the process, selling our house at a loss, and negatively affecting our financial security in retirement. This action by the Navy was in no way foreseeable, as the earlier levels of Prowler FCLP activity were widely known and completely bearable. If the Navy had been at all above-board about their plans for the region, we would never have built our house there. It is very sad when you realize that not only is your government not looking out for your best interest, but is actually the agent actively trying to damage your welfare.



# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: **(1) Provide written comments at today's public meeting;** **(2) Speak with the stenographer, who will record your comments;** **(3) Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);** or **(4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED] (Homeowners)

2. Organization/Affiliation \_\_\_\_\_

3. Address [REDACTED] Anacortes, WA 98221

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

Please consider pushing the base leg of landing approach approximately 1 mile north to go over Cypress Island (which is generally unpopulated) instead of over the Anacortes ferry/Guemes Channel area - which has a high population concentration.

Thanks

[REDACTED]

P.S. Thanks for the information meeting

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 3.a. Aircraft Operations

Seattle, WA 98118

Please do not increase flights out of the OLF in Coupeville, WA. As a former resident of Whidbey Island, I spent many days on Ebey's Landing and evenings enjoying dinner in Coupeville. It's a uniquely majestic place that deserves protection. Additionally, I am strongly opposed to the related war games proposed over the Olympic Peninsula. As a 25 year resident of Seattle, I have spent countless days enjoying the beaches, remaining forests and wildlife on the peninsula. It is a small patch of old growth forest and undeveloped beach compared to its original state and what is left along the Pacific coast. The people of Washington and the wildlife on the peninsula deserve its preservation as a unique sanctuary. I urge you to reconsider and abandon these proposals. Thank you.

1.a. Thank You

19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training

19.d. Electronic Warfare

7.d. Recreation and Wilderness Analysis and Study Area

camano, WA 98282

1.a. Thank You  
4.I. Points of Interest

we are right underneath the approach to nas airfield so the noise shakes the house and windows and you are unable to talk to someone in person or on the phone. we don't want more noise. camano residents are also affected by jet noise.

Deer Harbor, WA 98243

1. The EIS is flawed because it's based on a model that undervalues Growler noise impacts. Models are useful when direct measurements are unavailable, which is not the case here. Please measure Growler noise. It makes our dog bark. 2. The EIS is to be based on publicly available information, including noise data. Measurement data are available. 3. As the first two points suggest, use actual Growler noise measurements. The environmental impacts can be measured and therefore should be. NEPA relies on the best available information, not merely data that support the agency's favorite option. 4. Consider management alternatives. Some days the Growler noise over our home triggers repeated rounds of barking, interrupts my work as a writer and creates a sense of dread from not knowing when the next roar will occur. We stop talking to one another when Growlers are overhead because it's not worth trying to shout over the noise. This is not background noise. It is an interruption. Please consider managing Growler use on the assumption that you are affecting daily lives for people in the area. Thank you for your attention to these views.

- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.f. Economic Hardship and Impacts
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.o. Classroom Learning Interference
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife



Clinton, WA 98236

The potential environmental effects that this Growler aircraft expansion would create is totally unacceptable to me. Obviously, the number one effect, as a result of this escalation, is the increase in noise pollution, which in itself, is a public health and safety issue. I can speak about this, as I have experienced Meunière' Disease brought on by being exposed to excessive and repetitive loud decibels. The increased risk of damaging the water resources, as well as destroying the quality of the air is another major factor and cannot be dismissed. Who's paying attention to the fish and wildlife in Central Whidbey that are subjected to and bombarded by the same irritants? What about the stress, hypertension, migraines, insomnia and other maladies the citizens experience? Thirteen Growler aircraft are difficult enough to deal with, but when you speak of increasing that to 36, there is no justification for the negative impact this increase would create, on both animate and inanimate life forms. We live in a finite environment here on Whidbey Island and protecting all aspects of what that means should be our first and foremost concern.

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife



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To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: **(1) Provide written comments at today's public meeting;** **(2) Speak with the stenographer, who will record your comments;** **(3) Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);** or **(4) Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.**

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1. Name [REDACTED]
2. Organization/Affiliation Registered Nurse
3. Address [REDACTED] Coupeville, WA 98235
4. E-mail [REDACTED]
5. Please check here  if you would NOT like to be on the mailing list
6. Please check here  if you would like to receive a CD of the Final EIS when available

I am concerned about the cardiovascular effect of the  
flyovers especially on the elderly.

I am concerned about the Neurological effect on  
the young students and pre schoolers in the Coupeville area.  
The jets produce physical pain when traveling the trails  
near the Coupeville Elementary School

I am concerned about the tourist dependent  
local Economy.

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 12.h. Tourism
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

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I am concerned about the effect on the threatened  
Orea population and other wild life in this special  
unique natural environment.

For more information, please visit the project website at [whidbeyis.com](http://whidbeyis.com)

Please print

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic


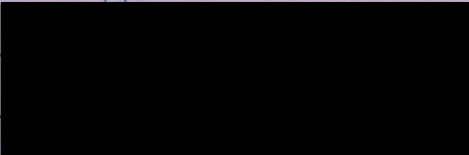
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

**Environmental Impact Statement Comment Form**  
*EA-18G Growler Airfield Operations at NAS Whidbey Island Complex*

Comments must be postmarked or submitted online by February 24, 2017

Online at: <http://www.whidbeyeis.com/Comment.aspx>  
 By mail at: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA  
 23508, Attn: Code EV21/SS

1.	Name	
2.	Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)	<u>Resident Citizen Ret. R.N.</u>
3.	Address	<u>Coupeville, VA</u>
4.	Email	

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

### Comments

Please check all that concern you and add additional comments on the back.

The environmental impacts of the following issues due to increased flight operations at the OLF are not adequately addressed in the draft Environmental Impact Statement (EIS):

- Health effects from noise and low-frequency sound.
- Businesses, schools, hospital, and County and Town public government operations in the Coupeville area.
- A decrease in tourism including in the town of Coupeville, hiking and birding at Ebey's Landing National Historical Reserve, the Casey Conference Center, Fort Casey State Park, The Pacific Rim Institute.
- A decrease in private property values due to noise.

(over)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.f. Economic Hardship and Impacts
- 12.h. Tourism
- 12.j. Property Values
- 12.l. Community Service Impacts
- 12.m. Education Impacts
- 12.n. Quality of Life
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquifer and well contamination.

Additional Concerns:

- The addition of large, new, and undefined Accident Potential Zones ( APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

Please include any additional comments and concerns here:

Whidbey Health will be able to provide statistics over the next five years on any increase in suicides and cardiovascular events in the affected areas. yearly testing of the hearing of Coupeville Elementary school children should also be done to see if noise mitigation efforts are needed to avoid hearing loss in this group of Coupeville's vulnerable people... I also have concerns about the already threatened local Orca population...

All comments will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

For more information, see, Coupeville Community Allies, [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

Coupeville Community Allies is a group of community members committed to sharing accurate information to all Coupeville and Whidbey Island residents regarding the Growler DEIS. We encourage everyone to get involved in the discussion of our future and to submit comments and concerns.



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1. Name

2. Organization/Affiliation

3. Address

4. E-mail

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

- I SUPPORT A NO ACTION ALTERNATIVE
- THE JET TRAFFIC FROM THESE INCREASINGLY LOUD PLANES IS ALREADY VERY DISRUPTIVE; CROWDERS MAY BE STRATEGICALLY HELPFUL TO THE NAVY'S MISSION, BUT THE EIS DOES NOT ADEQUATELY ACKNOWLEDGE THE INTENSE OPPRESSIVE PRESENCE THE EXISTING CROWDERS HAVE IN OUR DAY TO DAY LIVES ALREADY.
- THE EIS ALSO I THINK DOES NOT ADEQUATELY ASSESS CLIMATE CHANGE IMPACTS FROM THE INCREASE IN THIS OPERATION. WHILE CONSERVATION AND EFFICIENCIES THE NAVY HAS ACCOMPLISHED SO FAR ARE IMPORTANT, THESE PLANES ARE AN ASSAULT TO THE CLIMATE EVERY TIME THEIR LARGE 21<sup>ST</sup> CENTURY TECHNOLOGY BASED ENGINES ARE FIRED UP.

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 12.n. Quality of Life
- 18.d. Washington State Greenhouse Gas Goals
- 2.i. No Action Alternative
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

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THE REALITY OF INCREASING THE FREQUENCY AND VOLUME OF THESE  
INTERRUPTIONS ON OUR DAILY LIVES, FOR ME, MY FAMILY,  
MY ENJOYMENT OF THE LOCAL OUTDOORS, THE WILDLIFE THAT IS  
ORIENTED TOWARDS ACOUSTIC AWARENESS FOR THEIR SURVIVAL, IS  
AN IMPACT AND VERY DISTURBING POTENTIAL FOR THOSE OF  
US THAT LOVE THIS PLACE. THIS LAND, WATER, COMMUNITY...

For more information, please visit the project website at [whidbeyeis.com](http://whidbeyeis.com)

Please print

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**YOUR INPUT MATTERS**



# Public Meeting Comment Form

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1. Name [REDACTED]

2. Organization/Affiliation \_\_\_\_\_

3. Address [REDACTED] AVACORTES 98221-2022

4. E-mail \_\_\_\_\_

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

GOOD PRESENTATION. EVERYONE WAS HELPFUL & KNOWLEDGEABLE. My  
CONCERN IS NOISE. I WOULD LIKE TO SEE THE FLIGHT  
PLANS CHANGED UP MORE FREQUENTLY (TO SHARE THE PAIN)

I SUPPORT <sup>NAS</sup> WHIDBEY AND THE PILOTS  
I THINK YOU SHOULD ADVERTISE your NOISE  
COMPLAINT PH #s AT THE PRESENTATIONS

Please print • Additional room is provided on back  
 Please drop this form into one of the comment boxes here at the public meeting or mail to:  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 3.a. Aircraft Operations



Environmental Impact Statement Comment Form  
 EA-18G Growler Airfield Operations at NAS Whidbey Island Complex

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Online at: <http://www.whidbeyeis.com/Comment.aspx>

By mail at: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA  
 23508, Attn: Code EV21/SS

1. Name \_\_\_\_\_

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)

resident

3. Address \_\_\_\_\_ Coupeville WA

4. Email \_\_\_\_\_

Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture. This is a burden greater than the Coupeville/Central Whidbey community can bear.

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- A decrease in private property values due to noise.

(over)

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- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
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- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.g. Ebey's Landing National Historical Reserve
- 7.j. Impacts on Outdoor Sports

- Outdoor recreation limits, as well as children's and family's health, at Rhododendron Park ball fields.
- Noise impacts on commercial properties including agriculture.
- Aquifer and well contamination.

Additional Concerns:

- The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.
- The Navy did not adequately look at siting new Growler aircraft elsewhere despite this being one of the top issues from the community during the Navy's prior scoping forums.
- The impact on marine and terrestrial wildlife.
- The major security risk for Whidbey Island by siting all Growlers here.
- Mishaps and crash risks due to problems such as their onboard oxygen system.

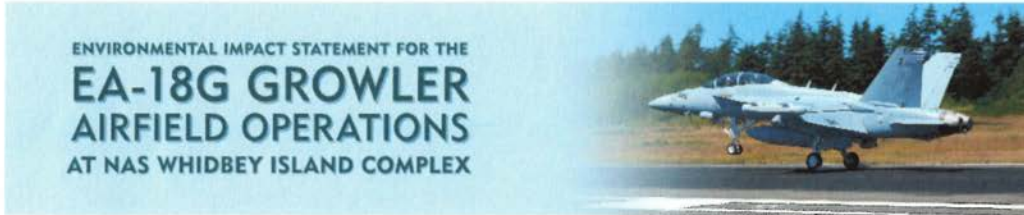
Please include any additional comments and concerns here:

I come from a Navy family. My father retired as a Rear Adm. and I understand the need for security, Naval operations. Yet the consequences and concerns above compel me to currently question this expansion. The risks and consequences are too great to support any plans. The physical health and well being of all living creatures are threatened along with those other concerns checked above. Also as we know from experience, there are always unknown negative consequences to a project of such dimension e.g. the recent contamination of water sources at OLF!

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Home Proposed Action Project Schedule Current EIS Documents Historical Documents Public Involvement Mailing List Sign-Up [Comments](#)

### COMMENTS

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Thank you for your interest in providing comments on the Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station (NAS) Whidbey Island. To be addressed in the Final EIS, comments must be submitted by February 24, 2017. All comments received will be reviewed by the Navy and responded to in the Final EIS.

PLEASE NOTE: Personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless required by law. The city, state, and 5-digit zip code of individuals who provide comments may be released.

First Name:



Last Name:

Agency/Organization:

City/Municipality:

Coupeville

State/Province:

select... WA

Zip/Postal Code:

98239

Comments:

ATTACHED

Would you like to join the mailing list for future updates?

[You will be redirected to the mailing list form upon submit]

Privacy Advisory: Please refer to the [Privacy Policy](#) that describes why this information is being collected and how it will be used.

Submit

Written comments may be mailed to:

EA-18G Growler EIS Project Manager  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard  
 Norfolk, VA 23508  
 Attn: Code EV21/SS

This is an official [U.S. Navy](#) web site.

The United States Fleet Forces Command is the official sponsor of this project website. Questions regarding its content may be directed to the Public Affairs Officer, Mr. Ted Brown, at (757) 836-4427.

- 1.a. Thank You
- 4.d. Day-Night Average Sound Level Metric
- 4.m. Supplemental Metrics
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.s. Health Impact Assessment and Long-term Health Study Requests
- 5.a. Accident Potential Zones
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

**COMMENTS ON THE ENVIRONMENTAL IMPACT STATEMENT FOR  
EA-18G “GROWLER” AIRFIELD OPERATIONS AT NAVAL AIR STATION  
WHIDBEY ISLAND COMPLEX  
VOLUME 1 AND 2**

February 20, 2017

[REDACTED]

My name is [REDACTED]. I have a home located in the Admirals Cove community at [REDACTED] on the southeast end of the OLF Coupeville, Washington field. Figure 1 below shows the location of Admirals Cove as it relates to Figure 4-3-1 of the EIS report. As you can see, the community where I live is under the direct path of the “touch and go” operation at OLF Coupeville. I am a member of the Navy League and am not associated with Citizens of Ebey’s Reserve (COER).

**Figure 1. Copy of EIS Volume 1 Figure 4.3-1 Showing the Location of Admirals Cove Relative to APZ-1 for the OPF Coupeville field.**

Figure 4.3-1 Existing 2005 AICUZ Clear Zones and Conceptual APZs for OLF Coupeville, Option 1



My family and I have experienced the noise impact during the Navy's Carrier Landing Practice (FCLP) operations for the past 15 years. Many flights are directly over our home at low altitudes (less than 350 feet). When the jets are flying, the house and our bodies reverberate from the noise levels. It is impossible to have any conversations either indoor or outdoor. It was impossible for our daughter to sleep during weeknight evening flights that occur regularly near or after midnight for several consecutive nights. The proposed maximum 10-fold increase in flights over our property will make it nearly impossible to live in our home. It is important to note that the Navy appears to have nearly suspended flights at the OLF during the EIS comment period. My family and I are also concerned about living in a potential aircraft crash zone.

I reviewed the Navy's EIS based on my experience as a licensed Certified Geological Engineer who has been responsible for preparation and review of numerous EIS documents, and as a work site noise safety officer. The noise and potential crash risk associated with the proposed increase in FCLPs will result in irreversible negative impacts on health and safety that are not addressed in the EIS.

I believe the EIS contains numerous, significant deficiencies, and substantial additional work is necessary to meet the minimum standards for an EIS of this nature. Specifically, the EIS:

1. Fails to establish an Air Installation Compatible Use Zone (AICUZ) and an Accident Potential Zone (APZ) for OLF Coupeville.
2. Does not define the actual noise level health and safety impacts on existing residences in the direct path of the landing operations.
3. Does not define the actual potential of aircraft crash risk specific to residences in the direct path of the landing operations.

I provide documentation and additional information about each of these three deficiencies below.

### **1. Need to Establish AICUZ and APZ for the OLF Coupeville Field**

The establishment of an AICUZ and APZ for Navy airfields is essential to define safe noise levels and potential crash zones for various land uses. It is my understanding that the establishment of an APZ is only done when annual flights exceed 5,000. There are two major mistakes in the EIS for the OLF Coupeville in relation to AICUZ and APZ: 1) using an outdated finding from the 2005 AICUZ process to justify not establishing an AICUZ and APZ, and 2) deferring the establishment of AICUZ and APZ until after the EIS process is complete. See direct quotes from the EIS below:

(EIS Page 4-116, Paragraph 4)

"At OLF Coupeville, it was determined during the 2005 AICUZ process that additional APZ coverage was not warranted at that time because operational numbers were below the threshold (approximately 5,000 operations per approach or departure flight track) for the establishment of APZs at that location."

(EIS Page ES-5 and ES-6)

"Conceptual APZs are presented for the purpose of analyzing potential land use impacts of the Proposed Action. At this time, no decision has been made with regard to additional APZs. The Navy

will perform an AICUZ update upon completion of this EIS and share official recommendations with the community.”

All of the FCLP total aircraft operations shown in EIS Table 4.1-5 exceed the 5,000 threshold for establishing an APZ for the OLF Coupeville field. The 2005 AICUZ conditions are no longer applicable to OLF existing and proposed flight operating conditions. Therefore, an APZ should be established for OLF Coupeville, just as an APZ was established for Ault Field.

The EIS provides conceptual APZ zoning for the OLF Coupeville shown on Figure 1 above. There are more than 500 residences (more than 1,000 people) that are clearly located in the conceptual APZ-1 zone. The Navy’s own rules requires a AICUZ and APZ for the OLF Coupeville facilities based on the current FCLPs, even before considering additional operations associated with the EIS.

**2. Actual Noise Level Health and Safety Impacts**

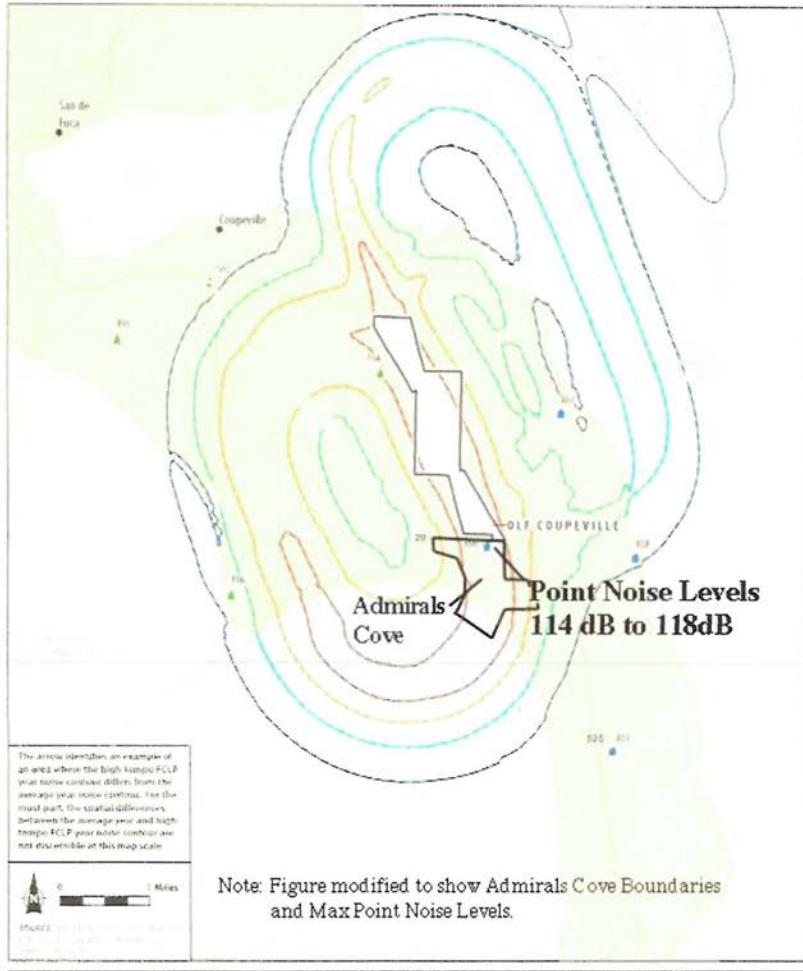
The average year noise exposure levels contour maps for the community of Admirals Cove does not match what residents in the community experience. The EIS Representative Points of Interest (RPOI) RO6 (in the middle of Admirals Cove) shows maximum sound exposure levels from 118 to 121 dB, as shown below.

Table 4.2-3 Maximum Sound Exposure Level (dB) and Maximum Sound Level (dB) for Representative Points of Interest in the Vicinity of the NAS Whidbey Island Complex, Alternative 1 (Average Year)<sup>1</sup>

ID	Description	Maximum SEL (dB)		L <sub>max</sub> (dB)		Number of Annual Events <sup>2</sup>				
		No Action Alternative	Alt 1	No Action Alternative	Alt 1	No Action Alternative	Alt 1 A	Alt 1 B	Alt 1 C	
<b>Residences</b>										
RO6	Admirals Dr. and Byrd Dr.	118	121 (+3)	114	118 (+4)	267	2,650 (+2,383)	1,613 (+1,346)	649 (+382)	

In EIS Table 4.2-3, the noise Maximum SEL (dB) and L<sub>max</sub> (dB) values for the No Action Alternative are 118 and 114. For Alternative 1 the levels are and 121 and 118. These values are significantly exceeding the levels reported in the EIS Figure 3.2-5. In Figure 3.2-5, the reported DNL noise level is 75 dB. I have noted the location of the Admirals Cove community in EIS Figure 3.2-5 below. Figure 3.2-5 misrepresents the actual noise levels, as noted in the EIS Table 4.2-3. **The model being used conflicts with actual measurements conducted by the Navy.**

Figure 3.2-5 No Action Environment for OLF Coupeville, NAS Whidbey Island Complex



● City	Points of Interest (POI):	No Action (Average)	No Action (High Terrain FCLP)
○ County Boundary	▲ Park	DMA Noise Contour (dB)	DMA Noise Contour (dB)
▬ Noise Road	■ Residential	60	60
□ Operational Area	■ School	65	65
		70	70
		75	75
		80	80

Figure 3.2-5  
No Action Environment for  
OLF Coupeville, NAS Whidbey Island Complex  
Whidbey Island, Island County, WA

### What Is The Health Risk?

Table 1-1 provides maximum noise exposure levels and duration of exposure that no worker should equal or exceed.<sup>1</sup> The maximum noise exposure level and duration for 118 dB and 114 dB is 14 and 15 seconds, respectively, for No Action Alternative. The maximum noise exposure level and duration for 121 dB and 118 dB is 7 and 14 seconds, respectively, for Alternative 1.

Table 1-1. Combinations of noise exposure levels and durations that no worker exposure shall equal or exceed

Exposure level, <i>L</i> (dBA)	Duration, <i>T</i>			Exposure level, <i>L</i> (dBA)	Duration, <i>T</i>		
	Hours	Minutes	Seconds		Hours	Minutes	Seconds
80	25	24		106	3	45	
81	20	10		107	2	59	
82	16			108	3	23	
83	12	42		109	1	53	
84	10	5		110	1	29	
85	8			111	1	11	
86	6	21		112		56	
87	5	2		113		48	
88	4			114		38	
89	3	10		115		28	
90	2	31		116		22	
91	2			117		18	
92	1	35		118		14	
93	1	16		119		11	
94	1			120		9	
95		47	37	121		7	
96		37	48	122		6	
97		30		123		4	
98		23	49	124		3	
99		18	59	125		3	
100		15		126		2	
101		11	54	127		1	
102		9	27	128		1	
103		7	30	129		1	
104		5	57	130-140		<1	
105		4	43				

2

Based on my direct observation for the past 15 years, a typical FCLP event consists of a single daylight period of 2 hours during the daytime and another 2-hour event period near midnight. During any 2-hour period, aircraft pass over my home about every 5 minutes for a total of 24 fly-overs every 2 hours, and a total of 48 for a FCLP per day. My best estimate is that we are exposed to the maximum noise level for approximately 20 seconds per fly over. This means residents in Admirals Cove are exposed to the maximum noise levels an estimated 16 minutes per FCLP day. This poses a serious health risk.

<sup>1</sup> U.S. Department of Health and Human Services, 1998, Criteria For A Recommended Standard: Occupational Noise Exposure, Revised Criteria 1998, June.

<sup>2</sup> U.S. Department of Health and Human Services, 1998, Criteria For A Recommended Standard: Occupational Noise Exposure, Revised Criteria 1998, June.



The EIS uses a model, not direct measurements, to determine that the impact is 70dB. This is not supported by the facts, and there is no specification in the EIS regarding the assumptions that were used to develop the model. Actual data about the maximum noise level exposure and duration is needed for an acceptable EIS. Directly measuring noise created by the jets for the individuals who reside directly under the flight path is simple and inexpensive. Why has this not been done?

The EIS refers to the 2005 report to discuss compatibility with land use, but only does so for Ault Field. The EIS does not discuss how the Navy’s AICUZ standards applies to OLF Coupeville. Furthermore, the EIS does not provide a table of land use classifications and compatibility guidelines, as has been done for other Naval Air Stations. For example, this analysis was done for Naval Station Norfolk Chambers Field<sup>3</sup> (see Navy Table 6-1 below).

Table 6-1  
Land Use Classifications and Compatibility Guidelines

	Land Use Compatibility with Noise Zone (DNL)						Land Use Compatibility with APZs		
	Noise Zone 1 <55 55-64		Noise Zone 2 65-69 70-74		Noise Zone 3 75-79 >80		Clear Zone	APZ I	APZ II
Single Family Residential	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible	Incompatible	Incompatible	(1)
Multi-Family Residential, Transient Lodging	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible	Incompatible	Incompatible	
Public Assembly	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible	Incompatible	Incompatible	
Schools and Hospitals	Compatible	Compatible	(2)	(2)	Incompatible	Incompatible	Incompatible	Incompatible	
Manufacturing (ex. Petrol/chem.; textile)	Compatible	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible	
Parks	Compatible	Compatible	Compatible	Compatible	Incompatible	Incompatible	(4)	(4)	
Business Services	Compatible	Compatible	(2)	(2)	Incompatible	Incompatible	(3)	(3)	
Agriculture, Forestry and Mining	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	

Source: Adapted from OPNAVINST 11010.36C

Notes:  
 This generalized land-use table provides an overview of recommended land use. To determine specific land-use compatibility, see Appendix B.  
 (1) = Maximum density of 1-2 dwellings per acre.  
 (2) = Land use and related structures generally compatible however, measures to achieve recommended noise level reduction should be incorporated into design and construction of the structures.  
 (3) = Maximum Floor Area Ratio that limit people density may apply  
 (4) = Facilities must be low intensity.

Key:  
■ Compatible  
■ Incompatible

According to the Navy’s EIS DNL noise level of 75 dB reported for the OLF Coupeville, the Admirals Cove residential community land use is “incompatible” with the proposed FCLPs.

<sup>3</sup> U.S. Department of the Navy, 2009, Air Installations Compatible Use Zones Study for Naval Station Norfolk Chambers Field, Norfolk, Virginia, 2009.

**This begs the question: Was the decision to defer the establishment of an AICUZ APZ Zone made because the Navy knew this would disqualify the proposed additional FCLP plans?**

By not defining specific APZ zoning for OLF Coupeville, the EIS does not accurately assess the impact and risk to the Admiral's Cove subdivision from potential air crashes from the proposed increase in flights over this community of over 500 residences. The EIS also dismisses the risk or any mitigation of risk based on the following EIS statement:

(EIS Page ES-5 & 6)

“Public Health and Safety. Increased operations increase the potential for flight incidents and bird-animal aircraft strike hazard, but existing management strategies would manage risk. Scenarios with high numbers of operations at OLF Coupeville may require the development of Accident Potential Zones (APZs) through the Air Installation Compatible Use Zone (AICUZ) update process, including Alternative 1, Scenario A; Alternative 1, Scenario B; Alternative 2, Scenario A; Alternative 2, Scenario B; Alternative 3, Scenario A; and Alternative 3, Scenario B. Conceptual APZs are presented for the purpose of analyzing potential land use impacts of the Proposed Action. At this time, no decision has been made with regard to additional APZs. **The Navy will perform an AICUZ update upon completion of this EIS and share official recommendations with the community.**”

**It is not acceptable to defer establishment of APZs for the OLF Coupeville field based on the FCLP's shown in Table 4.1-5. The establishment of an APZ is an essential requirement of this EIS study.**

Relative to commercial airline operations, the F-18 series aircraft has a high incidence of significant flight accidents. The EIS provides an extensive discussion on Navy flight safety training and procedures, but does not provide any estimate of the potential crash risk for the additional proposed FCLPs that could increase from 6,500 to 35,500. What is the estimated crash risk for those in the direct flight path?

Admirals Cove Lake is located within the conceptual APZ-1 zone for OLF Coupeville. Admirals Cove Lake is a 12-acre recreation and retention pond in the Admirals Cove subdivision. The lake is a major migratory resting pond for Canadian geese that typically has several hundred geese on the lake. The lake is also home to bald eagles, gulls, and numerous species of ducks. All of these birds are in the direct path and at altitudes of the touch and go flights for OLF Coupeville. The potential of bird air strikes represents a clear and present danger to proposed FCLPs at the OLF Coupeville.

### SUMMARY

The EIS for proposed additional FCLP's will result in irreversible impacts on the residents of Admirals Cove. Critical impacts are as follows:

1. AICUZ and APZ zones need to be established for OLF Coupeville.
2. The noise model used in the EIS directly conflicts with noise measurements made by the Navy for Admirals Cove. The model being used incorrectly

under-estimates the actual noise being experienced.

3. The noise level and duration experienced by those living under the direct flight path (including Admirals Cove) will exceed maximum allowable levels of over 121 dB. These noise levels and duration exceed U.S. Department of Health and Human Services safe noise level exposure standards.
4. Failure to establish AICUZs and APZs for the OLF Coupeville for the proposed FCLPs until the EIS process is complete will result in an automatic land use conflict of interest. Knowing a proposed land use is incompatible with existing land uses is not acceptable for an EIS analysis.



2/20/2017

Coupeville, WA 98239

Mailed comments on the EIS to the address below. Key issues are 1) no AICUZ & APZ for OLF Coupeville, 2) actual noise levels and duration experience in Admirals Cove exceed safe limits, and 3) Admirals Cove residential land use not compatible with conceptual APZ-1 designation.

- 1.a. Thank You
- 4.a. General Noise Modeling
- 4.m. Supplemental Metrics
- 5.a. Accident Potential Zones
- 7.a. Regional Land Use and Community Character
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

Seattle, WA 98115

My family and I have stopped camping on Whidbey Island because of the noise from the planes. I understand from research that has been done, that a lot of environmental damage is caused by the decibels of the planes to both humans and especially birds. I have just heard about the "war games" proposed for the Olympic Peninsula and find them absolutely unacceptable for a National Park. Besides the negative health effects for humans and animals living in the area, the huge economic impact from loss of tourism would be expected. The violation of one of Washington's most amazing natural areas is unacceptable.

- 1.a. Thank You
- 12.h. Tourism
- 12.n. Quality of Life
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 4.p. Sleep Disturbance
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Greenbank, WA 98253

I'm very concerned about the proposed increase in Growlers operations at the OLF in Coupeville, because: 1) concern about impacts of increased noise on health of residents, farmers, businesses, wildlife; 2) impacts of increased noise on property values and tourism in Coupeville and surrounding areas; 3) potential groundwater contamination from fire retardant chemicals; 4) inadequate research on alternative locations for this Growler activity (please move it to a location where there are not so many residents and farms impacted). On a strictly selfish note, the planes have ruined more than one of my hikes at Ebey's Landing National Historical Reserve, due to the intense noise and proximity of the aircraft.

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.j. Property Values
- 2.k. Range of Alternatives
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.g. Ebey's Landing National Historical Reserve



Freeland, WA 98249-9647

Info: I have written 6 letters over the last 2 yrs, to no avail! So here is another!

It is clear methods were used to infer, persons opposed to OLF were against the military! Not true!

I am 85 yrs. old.. lived through the WWII. All of the men in the family served!

Iwo Jima

Flying Burma Hump

Japan '45 Post War

Italy - Battle of the Bulge.

2 Marines - Stateside

Facts: Airstrip developed for WWII planes - not Growlers and Prowlers.

- Whidbey Island is a small island - 50 miles - It cannot sustain this tragic assault.

- Housing prices have fallen!

- Adding an additional squadron housing has become a serious problem,

- When in Coupeville at flying time, you must hold on to something and cover your head.

- As a retired early education teacher the health of our children is a great danger and the military knows this! 23 Flights in a day!

Other open areas in Washington, California and Nevada - owned by the Navy! Available!

This must stop!

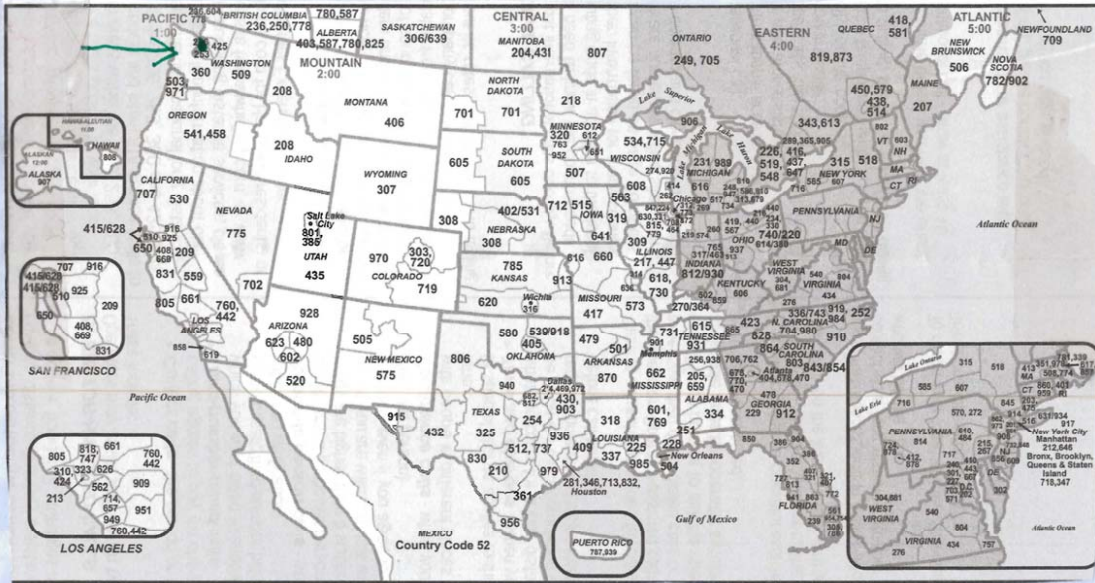
Please - the children: -



Freeland, WA 98249-9647

I'm hoping this visual will help you see the danger!

That green dot.  
This is Whidbey Island in Puget Sound  
50 miles South to North  
This little island!





Portland, OR 97213

DO NOT CONDUCT WAR 'GAMES' OVER THE OLYMPIC PENINSULA. Many features of the area will be adversely affected by that action. And the toxics created by the burning of fossil fuels in all the vehicles will damage a pristine area. 1 billion birds (already threatened by climate change) fly up and down the pacific coast using it to navigate. This will cause harm to those birds. The Navy's own supporting documents say: "Friendly Electronic Attack could potentially deny essential services to a local population that, in turn, could result in loss of life." But most important from a climate perspective, each jet burns 1304 gallons PER HOUR and produces 12.5 metric tons of CO2 per hour! Just for perspective that is 23% more than the ANNUAL CO2 emissions of a WA state citizen! Do simulations if you must - but save that fuel for the moment when we actually need it - or better conduct those 'games' over DC. Thank you, [REDACTED]

1.a. Thank You

10.a. Biological Resources Study Area

10.b. Biological Resources Impacts

10.l. Bird Migration

18.b. Average Carbon Dioxide per Aircraft

19.d. Electronic Warfare

4.v. Impacts to Domestic Pets, Livestock, or Wildlife

6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 2.e. Public Involvement Process
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 7.d. Recreation and Wilderness Analysis and Study Area

1 UNITED STATES NAVY  
2 PUBLIC MEETING  
3 FORT WORDEN STATE PARK CONFERENCE CENTER  
4 USO HALL  
5 200 BATTERY WAY  
6 PORT TOWNSEND, WASHINGTON  
7 DECEMBER 5, 2016

8  
9

10  
11

12 ENVIRONMENTAL IMPACT STATEMENT (EIS)  
13 FOR EA-18G "GROWLER" AIRFIELD OPERATIONS  
14 AT THE NAVAL AIR STATION (NAS)  
15 WHIDBEY ISLAND COMPLEX

16  
17

18  
19

20  
21

Court Reporter: Nicole Johnson  
Olympic Court Reporting Services  
Chimacum, Washington 98325  
(360) 732-4600

22  
23  
24

25

12           ██████████: My comments regarding the draft  
13 EIS of the EA-18G Growler Airfield Operations. The USO is  
14 a terrible place to have a meeting. Nobody can hear.  
15 It's very loud. The meeting should not be changed at the  
16 last moment. Some people may not know where to go. I  
17 request that the hearing be held again -- the meeting.

18           I'm wondering the following questions: What  
19 measures are they taking -- is the Navy taking to make  
20 sure that children are not negatively affected by the loud  
21 sounds of the Growlers? What scientific proof do they  
22 have?

23           Next question. What steps is the Navy taking to  
24 make sure that all adults do not suffer from any hearing  
25 loss? And what scientific proof do they have?

1           Next question. What steps is the Navy taking to  
2 make sure that elderly people are not suffering from  
3 hearing loss because of the Growler jets? And what  
4 scientific proof do they have?

5           Next question. What proof does the Navy have  
6 that the Growler jet noise is not harming wildlife -- all  
7 species of wildlife? And what scientific proof do they  
8 have?

9           Next question. What is the Navy doing to make  
10 sure that they are not harming the values of the  
11 U.S. National Parks when they fly over the Olympic  
12 National Park? And what proof do they have?

13           Thank you.

Quilcene, WA 98376

I have lived on the Olympic Peninsula for 36 years, I own property on the West End in Clallam Bay and on the east side in Quilcene. I was married to a Vietnam Veteran for 28 years. My husband and I are both OPPOSED to ANY military operations occurring on or around the Olympic Peninsula. These are the reasons why- 1. Our main "industry" is the environment. Tourism is sustainable, profitable and people/earth friendly. Growler Jet maneuvers are NOT. Noise is extremely offensive, visually they are offensive and electromagnetically offensive. 2. There are many veterans with PTSD and I have been witness to these jets triggering a severe traumatic reaction. They also are incompatible to all wildlife for the same reason. 3. We were told at one meeting that one reason for training nearer Whidbey was so the pilots could be closer to their families instead of having to use the eastern Oregon area which is already established and sufficient. While sympathetic, Our response to this is, by choosing to be in the service, adapting to separation and distances is the norm. The thousands of people affected by these jets far surpasses the inconvenienced family members. 4. We do NOT want all the pollution from these jets. Sound, sight, air and psychological. 5. They are contraindicated to our values. They are NOT the sound of Freedom. They are offensive and have no place on the Olympic Peninsula, or anywhere else for that matter... Thank you

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.a. Purpose and Need
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

Quilcene, WA 98376

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- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.a. Purpose and Need
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

To: EA-18G EIS Project Manager  
 Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS 6506  
 Hampton Blvd.  
 Norfolk, VA 23508

Dear Sir/Madam,

Thank you for extending the comment period to February 24, 2017, in order to accommodate the fact that having four major public processes open over the holidays, all concerning Navy activities or the biological resources that may be affected by them, made it difficult to read, comprehend and prepare comments in a timely way.

**1. Jet noise outside the immediate environs of the runways on Whidbey Island is not being evaluated, yet impacts are significant.** Noise from EA-18G Growlers is affecting communities far outside the vicinity of Naval Air Station Whidbey Island, yet the only area the Draft Environmental Impact Statement (DEIS) analyzes in its “study area” is what falls within 6 to 10 miles of the corners of runways. Growler aircraft, which are capable of 150 decibels (dB), use these runways to get airborne and to land; therefore, what happens outside the study area cannot be ignored as if it does not exist, because *all* flight operations are functionally connected to takeoffs and landings. By considering only takeoff and landing noise and exhaust emissions at Ault Field and Outlying Field (OLF) Coupeville, the DEIS fails to consider the wider area of functionally connected impacts caused by naval flight operations. By failing to consider the interdependent parts of a larger action that cannot proceed without takeoffs and landings, as well as their impacts, the DEIS fails to evaluate cumulative effects.

**2. Impacts to cultural and historic sites are not adequately considered.** The Navy so narrowly defined the Area of Potential Effect (APE) for cultural and historic resources that it also fails to consider significant nearby impacts. The State Historic Preservation Officer confirmed this in a January 9, 2017 letter to the Navy. ([http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN\\_122916-2.docx](http://westcoastactionalliance.org/wp-content/uploads/2017/01/SHPO-Letter-102214-23-USN_122916-2.docx)) She said that not only will cultural and historic properties within existing APE boundaries be adversely affected, but additional portions of Whidbey Island, Camano Island, Port Townsend vicinity and the San Juan Islands are also within noise areas that will receive harmful levels of sound and vibration from Growler activity. The US Department of Housing and Urban Development posted noise abatement and control standards that classify the 65 dB levels being used by the Navy as “normally unacceptable” and above 75 as being “unacceptable.” (<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/>) Residents in these outlying areas, who live many miles from these runways, have recorded noise at least twice that loud. Therefore, by failing to include these areas, this DEIS violates both the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA).

- 1.a. Thank You
- 1.b. Best Available Science and Data
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.f. Endangered Species Impact Analysis Adequacy
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.k. Compensation to Citizens for Private Property
- 19.a. Scope of Cumulative Analysis
- 19.b. Revised Cumulative Impacts Analysis
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 19.h. Cumulative Impacts on Biological Resources
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.i. Proposed Action
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.d. Arrivals and Departures
- 4.a. General Noise Modeling
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.e. Day-Night Average Sound Level Contours and Noise
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.i. Other Noise Metrics Not Currently in Analysis
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.t. Noise Mitigation
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 8.a. Cultural Resources Area of Potential Effect
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.j. City of Port Townsend Cultural Resources

**3. Piecemealing projects to avoid analyzing cumulative effects is illegal.** The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into at least six separate actions:

1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft;
2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers);
3. 2012 EA (26 Growlers including 5 from a reserve unit);
4. 2014 EA (Growler electronic warfare activity);
5. 2015 EIS discussing electronic warfare training and testing activity;
6. The current 2016-2017 DEIS (36 Growlers);
7. And, likely, a seventh process, as confirmed by news reports and a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160.

Therefore, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish. In just four documents—the 2014 EA, Forest Service permit Draft Decision, and the 2010 and 2015 EISs, there are more than 6,000 pages of complex technical material. The number of Growler flights at Outlying Field (OLF) Coupeville *alone* went from 3,200 per year to a proposed 35,100 in 2017. That’s more than a 1,000 percent increase at this runway alone, yet according to the Navy, there are “no significant impacts.” The National Environmental Policy Act (NEPA 40 C.F.R. §1502.4) “... does not allow an approach that would permit dividing a project into multiple ‘actions,’ each of which individually has an insignificant environmental impact, but which collectively have a substantial impact.”

The DEIS evaluates not the totality of impacts from the current fleet of 118 Growlers, nor the projected total of 160 of these aircraft, but slices out 36 of them for an incremental, piecemealed look, and concludes from both the construction activities and the addition of just these 36 new Growlers to the fleet, that no significant impacts will occur in the following categories: public health, bird-animal strike hazards to aircraft, accident potential zones, emissions of all types, archaeological resources, American Indian traditional resources, biological resources, marine species, groundwater, surface water, potable water, socioeconomics, housing, environmental justice, and hazardous waste. To state the obvious, impacts from this many Growlers, when taken together, are likely to be significant. Segmenting their impacts has allowed the Navy to avoid accountability.

**4. The DEIS does not analyze impacts to groundwater or soil from use of firefighting foam** on its runways during Growler operations, despite the fact that before this DEIS was published, the Navy began notifying 2,000 people on Whidbey Island that highly toxic carcinogenic chemicals had migrated from Navy property into their drinking water wells, contaminating them and rendering these people dependent on bottled water.

**5. The DEIS fails to discuss, describe or even mention any potential impacts associated with electromagnetic radiation** in devices employed by the Growlers in locating and interacting with the ground transmitters. It fails to mention any potential



impacts associated with aircrew practicing using electromagnetic weaponry, that will allow the Navy to make good on its 2014 statement that this training and testing is “turning out fully trained, combat-ready Electronic Attack crews.”

**6. The current comment period on a Draft EIS should not be the last chance** the public will have for input. However, Navy announced on its web site that it does not intend to allow a public comment period on the Final EIS. The “30-day waiting period” proposed for the Final EIS is not a public comment period, and thus would be unresponsive to serious and longstanding public concerns on matters that will affect our lives as well as the lives of people doing business throughout the region, plus the visitors who are the tourism lifeblood of our economy, and the wildlife that inhabits the region. The Navy must allow the public to participate throughout the process, in order to be able to be able to assess the full scope of direct, indirect and cumulative impacts. This is doubly important because so many impacts have been excluded from analysis. A federal agency is required to prepare a supplement to either a draft or final EIS, and allow the public to comment, if there are significant new circumstances or information relevant to environmental concerns, that bear on the proposed action or its impacts.

**7. There are no alternatives proposed in this DEIS that would reduce noise.** This violates NEPA §1506.1, which states, “... no action concerning the proposal shall be taken which would have an adverse environmental impact or limit the choice of reasonable alternatives.” According to a memo from the President’s Council on Environmental Quality (CEQ) to all federal agencies, “Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.” (<https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>) The three alternatives presented by the Navy are merely a shell game of choices among the same number of flights, but for different percentages of activity at runways. This pits communities against each other, as the runway that receives more flights will determine the “loser” among these communities.

**8. The Navy has exacerbated the problem stated in #8 by not identifying a preferred alternative** in the DEIS. According to the CEQ memo, “[NEPA] Section 1502.14(e) requires the section of the EIS on alternatives to “identify the agency’s preferred alternative if one or more exists, in the draft statement, and identify such alternative in the final statement . . .” Since the Navy has not done this, communities cannot evaluate potential noise levels. Since the Navy has also announced that it will not provide a public comment period for the Final EIS, communities will have no chance to evaluate the consequences or even comment on the preferred alternative.

**9. The Navy states that it evaluated noise for the Olympic Peninsula in 2010** with the Northwest Training Range Complex EIS, but that document did not do so. The Navy claims its documents are “tiered” for this purpose, but they are not. Had the activities contemplated by the proposed Electronic Warfare Range been evaluated by that EIS, the ground-based mobile emitters should have been listed as an emission source. They were not. For Electronic Combat and Electronic Attack, the only areas listed by activity and

training area, warfare type, and Range and Training Site were the Darrington Area and W-237. Neither is on the Olympic Peninsula. Had noise been properly evaluated, the Olympic MOAs should have been listed. They were not. Therefore, noise from Growler activities has not been evaluated in this or any previous for the Olympic Peninsula.

**10. The Navy has neither measured, modeled, nor considered direct, indirect or cumulative effects of jet noise** in any areas outside the immediate environs of NASWI runways. Actual noise measurements have not been made anywhere. However, computer modeling for the 10-mile radius of the “Affected Noise Environment” around Naval Air Station Whidbey Island (NASWI) extends to the year 2021 and clearly demonstrates the Navy’s ability to model noise. Therefore it makes no sense to fail to measure or model highly impacted areas such as the West End of the Olympic Peninsula, with its very different terrain and weather conditions, as demonstrated by separate NOAA weather forecasts for each region. For example, the Hoh River is surrounded by steep-sloped mountains that amplify and echo noise. Port Townsend is on a peninsula surrounded on three sides by water, which echoes sound. Port Angeles gets reflected sound from the Strait of Juan de Fuca to its north and from the Olympic Mountains to its south. Yet no noise modeling or measurements have been done for these areas.

**11. The Navy’s claim that areas outside the narrow boundaries of its study area do not exceed noise standards is suspect**, first because the standards used by the Navy are unrealistic, second, because the Navy has never measured or modeled noise in these areas, and third, because the “library” of sounds that comprise the basis for the Navy’s computer modeling is not available for public inspection. The Navy uses the less realistic Day-Night Average Sound Level (DNL) rather than the Effective Perceived Noise Level, as provided in Federal Aviation Regulation 36. DNL uses A-weighting for the decibel measurement, which means jet noise is averaged with quiet over the course of a year to come up with a 65 dB average. This means peak noise levels in these un-measured and un-modeled communities and wildlands may far exceed 65 dB as long as the constant average with quiet periods over a year stays below 65 dB. This is unrealistic, and claims by the DEIS that wildlife are “presumably habituated” to noise do not apply when that noise is sporadic and intense.

**12. Commercial airport noise standards should not apply to military jets** because commercial jets do not have afterburners, do not engage in aerial combat maneuvers, do not fly at low altitudes or practice landing on runways so short they can only be used for emergencies, do not possess the flight characteristics of Growlers, and do not have weaponry that is capable of making a parcel of forest hum with electromagnetic energy. FAA policy does not preclude use of the more accurate Effective Perceived Noise Level as the standard, nor are local jurisdictions prevented from setting a lower threshold of compatibility for new land-use developments. FAA policy allows for supplemental or alternative measurements. So, the continued use of DNL may be to the Navy’s benefit, but does not benefit the public.

**13. The Navy's noise analysis does not allow for peak noise experiences,** nor does the DNL method they use take into account low-frequency noise, which is produced at tremendous levels by Growlers.

**14. The NOISEMAP software used for computer modeling is severely outdated,** and a report from a Department of Defense commission concluded that noise measurements using this software "... do not properly account for the complex operational and noise characteristics of the new aircraft." This report concluded that current computer models could be legally indefensible. (<https://www.serdp-estcp.org/Program-Areas/Weapons-Systems-and-Platforms/Noise-and-Emissions/Noise/WP-1304>)

**15. The Navy describes its activities using the term "event," but does not define it.** Therefore, the time, duration, and number of jets in a single "event" remain unknown, and real impacts from recent increases remain unevaluated. As a result of leaving out vast geographical areas where noise impacts will occur (and are occurring now), the DEIS eliminates far too many direct, indirect and cumulative effects to be considered a valid or complete analysis. Limiting the scope like this amounts to a segmentation of impacts that forecloses the public's ability to comment and gain legal standing. By law, the public has the right to address the full scope of impacts, not just a narrow sliver of them.

**16. New information that was not disclosed** in previous Navy EISs include flight operations on weekends (not mentioned in the current DEIS but specified on page 11 of the Forest Service's draft permit, viewable at: <https://www.fs.usda.gov/project/?project=42759>). It has long been understood that the Navy would cooperate with local governments, especially in communities that depend on tourism, by not conducting noise-producing operations on weekends. Further, the singling out of one user group for an exemption from noise is outrageous and unfair. According to the permit, weekend flying may be permitted so long as it does not interfere with "... opening day and associated opening weekend of Washington State's Big Game Hunting Season for use of rifle/guns." While such an exemption is under Forest Service and not Navy control, the Navy must realize that municipalities and local governments, along with economically viable and vulnerable tourism and recreation entities who are not being considered, have not been given the opportunity to comment. The impression is that our national forests are no longer under public control.

**17. Low flights will make even more noise than before:** While the Navy has repeatedly told the public over the past few years that Growlers will fly at a minimum of 6,000 feet above sea level, the DEIS quotes guidance from the Aircraft Environmental Support Office: "Aircraft are directed to avoid towns and populated areas by 1 nm (nautical mile) or overfly 1,000 feet AGL (above ground level) and to avoid airports by 3 nm or overfly 1,500 AGL." This guidance further states, "Over sparsely populated areas, aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure." If this official guidance directs Growlers to fly at such low altitudes, why did the Navy not disclose this in any previous NEPA documents? For an aircraft capable of 150 decibels at takeoff, this new information represents a significant new level of noise impacts that have been neither previously disclosed nor analyzed.

**18. Sound levels for these low flights are not listed in the DEIS:** Table 3.1-2, titled “Representative Sound Levels for Growler Aircraft in Level Flight,” on page 3-6, does not show sound exposure levels for Growlers flying at either 1,000 feet or 1,500 feet AGL, as mentioned in the official guidance. Why has this important information been omitted? The public needs to know how much actual noise exposure there will be, along with the threats posed to public and environmental health. This, therefore, is significant new information about impacts that were not disclosed in the DEIS, and requires either that a Supplemental EIS be prepared, or that a public comment period of adequate length be provided on the Final EIS. For public health and safety reasons, the Navy must revise its guidance to significantly increase the distances that Growler jets are currently allowed to fly over towns, airports, individual people, vessels, vehicles, and structures. 500 to 1,000 feet is far too close, and 1,500 feet over an airport is far too dangerous a proximity to supersonic Growler jets.

**19. No mitigation for schools:** The DEIS states that in the case of local schools, no mitigation measures for any of the 3 proposed alternatives were identified, “... but may be developed and altered based on comments received.” Some schools will be interrupted by jet noise hundreds of times per day. Yet the Navy suggests that future mitigation measures might be brought up by the public (and subsequently ignored) and thus will be “... identified in the Final EIS or Record of Decision.” Such information would be new, could significantly alter the Proposed Actions, and would therefore require another public comment period, in which case the Navy’s proposal to *not* allow a comment period on the Final EIS would be unlawful.

**20. The current DNL noise modeling method and data in no way reflect exposure accuracy, given the new information** about low flight levels from official guidance. Therefore, such analyses must be included in a Supplemental EIS or in the Final EIS, with a new public process of adequate length, including an official comment period.

**21. Crash potential is higher:** With no alternatives provided to the public that reduce noise, and with such permissive guidance that allows such low-altitude flight, the potential for Navy Growler student pilots to create tragic outcomes or cause extreme physical, physiological, economic and other harms to communities and wildlands, whether accidentally or on purpose, is unacceptable.

**22. Contamination of drinking water** in residential and commercial areas near the runways, due to use of hazardous chemicals, is completely ignored by the DEIS. It concludes, “No significant impacts related to hazardous waste and materials would occur due to construction activities or from the addition and operation of additional Growler aircraft.” While these chemicals have never been analyzed, they have been used in conjunction with Growler training and other flight operations for years; therefore, hazardous materials analysis for these chemicals should not be excluded just because Growlers are not the only aircraft this foam has been used for. It is irresponsible for the DEIS to content that there are no significant impacts. As previously stated, with flights at OLF Coupeville alone increasing from 3,200 in 2010 to as many as 35,100, no one can

claim that a 1,000 percent flight increase in 7 years for which no groundwater or soil contaminant analyses have been done is not significant.

**23. Navy knew about contamination in advance:** It is clear that before the November 10 publication of this DEIS, the Navy was well aware of potential problems with contamination of residential drinking water due to what it calls “historic” use of fire suppressants for flight operations. In May 2016 the USEPA issued drinking water health advisories for two PFCs, and the Navy announced in June that it was in the process of “identifying and for removal and destruction all legacy perfluorooctane sulfonate (and PFOA) containing AFFF [aqueous film forming foam].” Yet the DEIS dismisses all concerns with an incredible statement about actions that took place nearly 20 years ago: “Remediation construction was completed in September 1997, human exposure and contaminated groundwater exposures are under control, and the OUs at Ault Field and the Seaplane Base are ready for anticipated use (USEPA, 2016e).” The statement is ludicrously outdated, and recent events refute it. Three days before the DEIS was published, on November 7, 2016, the Navy sent a letter to more than 100 private and public drinking water well owners expressing concern that perfluoroalkyl substances (PFAS) found beneath the OLF had spread beyond Navy property. Yet the word “perfluoroalkyl” or “PFAS” is not mentioned once in the entire 1400-page DEIS, nor is it mentioned the 2005 or 2012 EAs. A Department of Defense publication makes it clear that there is no current technology that can treat soil or groundwater that has been contaminated with these chemicals. (<https://dec.alaska.gov/spar/ppr/hazmat/Chemical-&-Material-Emerging-Risk-Alert-for-AFFF.pdf>)

**24. No mention of contaminated soil is found in the DEIS:** It confines its discussion to soil compression and compaction effects from new construction, and concludes there will be no impacts to groundwater. It is therefore puzzling to consider that while extensive evaluations for a variety of hazardous materials were included in the October 2015 Northwest Training and Testing Final EIS, why would the Navy omit such contaminants as the ones mentioned above, from the Growler DEIS? This is the equivalent of a doctor refusing to look at an EKG that clearly shows a heart attack, and diagnosing the patient with anxiety. The Navy needs to include this information in a public NEPA process as an impact of its flight activities. It needs to accept responsibility for this contamination, and pay the costs incurred by finding a permanent alternative source of water for affected residents, and by reimbursing these people for medical costs created by unwitting consumption of Navy-contaminated water.

**25. Impacts to wildlife have been piecemealed:** It does not make sense to separate impacts from just one portion of an aircraft’s flight operations and say that’s all you’re looking at. But because the scope of the DEIS is limited to areas adjacent to runways, analysis of impacts to wildlife from connected flight operations that occur outside these narrow confines are omitted. Threatened and endangered species, sensitive species and other wildlife and critical habitat areas are adversely impacted by noise from takeoffs, landings and other flight operations well beyond the Navy’s study area. For example, the increase in aerial combat maneuvers (dogfighting) from 160 to 550 annual “events,”

which by their erratic nature cannot safely occur near runways, is a 244 percent increase that has been neither examined nor analyzed in this or any previous NEPA process. Dogfighting requires frequent use of afterburners, which are far louder and use as much as ten times the amount of fuel as normal flight does. Impacts to wildlife and habitat were completely omitted.

**26. Pages of boilerplate language do not constitute analysis of impacts to wildlife:**

Except for standardized language copied from wildlife agencies about species life histories, along with lists of various county critical areas ordinances and state wildlife regulations, the DEIS fails to evaluate direct, indirect or cumulative impacts to wildlife. Instead, it offers the excruciating conclusion that the potential for noise impacts and collisions with birds is “greatest during flight operations.” However, continues the DEIS, except for the marbled murrelet, the occurrence of these sensitive species in the study area is “highly unlikely,” largely because “no suitable habitat is present.” This begs the question: if the scope of this DEIS measured the true impacts of jet noise, it is highly *likely* that suitable habitat for many of these species would be found. And if impacts had not been segmented for decades, there might be suitable habitat remaining in the study area.

**27. Old research cited but new research not:** In citing published scientific research, the Navy included a 1988 synthesis of published literature on domestic animals and wildlife, but failed to consider the latest peer-reviewed research summarized in 2015, which lists multiple consequences of noise greater than 65 dB. (<http://onlinelibrary.wiley.com/doi/10.1111/brv.12207/abstract>) The DEIS also failed to consider an important 2014 study called “Anthropogenic EM Noise Disrupts Magnetic Compass Orientation in Migratory Birds,” (<http://www.nature.com/nature/journal/v509/n7500/full/nature13290.html>) A federal agency cannot cherry-pick scientific research for its own convenience; it must consider the *best available science*. This DEIS fails that test.

Thank you for considering these comments.

Sincerely,

[REDACTED]

Freeland, WA

I own land and am a tax-paying citizen of Whidbey Island. This Navy plan to train aircraft personnel and do air warfare exercises over and around Whidbey Is. is extremely dangerous to its civilian population, to say nothing of the wildlife on, over and around Whidbey Is., as well as Naval personnel. This plan is a disaster in the making, and must be stopped until it is revised to meet the safety and environmental stipulations below in the final EIS, and/or be moved to where these EIS provisions can be met. The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP). The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather than busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance. The DEIS claim that the JGL noise study was “flawed” is disingenuous and unsupportable, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data. The DEIS misconstrued important findings of the National Park Service’s 2015 noise study at Ebey’s Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconception has to be credibly revised to properly characterize the real impacts. Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature. The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy’s defined “hazardous noise zone” threshold (i.e., an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month). Island County has unconscionably ignored the Navy’s 2005 AICUZ land-use directives for Outlying Field Coupeville, especially as reflected by construction permits issued in Noise Zone 2 areas, where the AICUZ stipulates no residences should occur, as well as other land uses. Whether due to the County’s willful intent to ignore or due to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and similar land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should immediately advocate that the County place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved. The two most dangerous aspects of flying are the approach, landing and takeoff — in other words most of the OLFC flight path. The risks are significant (a) because of unrestrained and major encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of FCLP standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes exacerbated by the significant shoreline bird population. These risks cannot be mitigated

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- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.k. Aircraft-Wildlife Strike and Hazing/Lethal Control of Wildlife
- 11.d. Per- and Polyfluoroalkyl Substances
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- 4.q. Potential Hearing Loss
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- 5.a. Accident Potential Zones
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- 5.d. Environmental Health Risks and Safety Risks to Children
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- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

other than by moving the FCLPs to a suitable 21st century off-Whidbey site. Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise. Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the related past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of the impacted wells. Leakage of PFAS in storage or their use in a crash event is a hugely relevant environmental impact that must be addressed. And the public must be given the opportunity to comment. The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was relatively complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% use projection of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected. The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the "percent probability of awakening for all scenarios..." While music torture is still permitted under US law, the United National Convention against Torture defines torture as "any act by which severe pain of suffering, whether physical or mental..." Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations. The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states, "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and reanalyzed. The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated. The DEIS fails to adequately address the effects of high noise levels during pregnancy that provoke significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.



Seattle, WA 98115

I own land and pay taxes on Whidbey Island. This Navy plan to train aircraft personnel and do air warfare exercises over and around Whidbey Is. is extremely dangerous to its civilian population, to say nothing of the wildlife on, over and around Whidbey Is., as well as Naval personnel. This plan is a disaster in the making, and must be stopped until it is revised to meet the safety and environmental stipulations below in the final EIS, and/or be moved to where these EIS provisions can be met. The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP). The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather than busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance. The DEIS claim that the JGL noise study was “flawed” is disingenuous and unsupportable, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data. The DEIS misconstrued an important finding of the National Park Service’s 2015 noise study at Ebey’s Landing Historic National Reserve and obfuscated a forthright analysis of the impacts on visitor experience. That misconstruction has to be credibly revised to properly characterize the real impacts. Much like the tobacco industry did years ago, the DEIS selectively and reprehensively cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature. The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy’s defined “hazardous noise zone” threshold (i.e., an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month). Island County has unconscionably ignored the Navy’s 2005 AICUZ land-use directives for Outlying Field Coupeville, especially as reflected by construction permits issued in Noise Zone 2 areas, where the AICUZ stipulates no residences should occur, as well as other land uses. Whether due to the County’s willful intent to ignore or due to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and similar land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should immediately advocate that the County place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved. The two most dangerous aspects of flying are the approach, landing and takeoff — in other words most of the OLFC flight path. The risks are significant (a) because of unrestrained and major encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of FCLP standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes exacerbated by the significant shoreline bird population. These

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risks cannot be mitigated other than by moving the FCLPs to a suitable 21st century off-Whidbey site. Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise. Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the related past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of the impacted wells. Leakage of PFAS in storage or their use in a crash event is a hugely relevant environmental impact that must be addressed. And the public must be given the opportunity to comment. The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was relatively complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% use projection of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected. The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the “percent probability of awakening for all scenarios...” While music torture is still permitted under US law, the United National Convention against Torture defines torture as “any act by which severe pain of suffering, whether physical or mental...” Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations. The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states, “Noise can pose a serious threat to a child’s physical and psychological health, including learning and behavior,” but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and reanalyzed. The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated. The DEIS fails to adequately address the effects of high noise levels during pregnancy that provoke significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss.

1.a. Thank You

nordland, WA 98358

I have no problems with the military excercises . a small inconvenience. Thank you

██████████

██████████

Olympia, WA 98501

National Parks are public parks in use for conservation- using the Olympia Forest for military training & war games is an obscene contradiction of this purpose. As I am in the mist of relocating to Olympia, please let it be that this proposal by the Navy is very disconcerting for me - enough so that I may find myself looking to another county, even state to retire to. I am shocked that the state of WA is even considering the Navy's proposal! Please refuse the Navy's proposal for the rights of the citizens of your state and our country at large to have access to all National Parks and for the importance of conserving these parks henceforward for future generations.

1.a. Thank You

19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training

19.d. Electronic Warfare

7.d. Recreation and Wilderness Analysis and Study Area

1.a. Thank You

Victoria , British Columbia V9b1a6

I have no issues with the Growlers, I can't hear them from my house in view royal. I am a self-professed aviation enthusiast, especially military.

Coupeville , WA 98239

1.a. Thank You  
11.d. Per- and Polyfluoroalkyl Substances

I have concerns regarding water quality, not just in private wells. Additional testing and mitigation should be provided for those on city water. Thank you.

Coupeville , WA 98239

- 1.a. Thank You
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation

Noise modeling and noise averaging are obviously insufficient. Why not measure real noise in the environment that is being impacted? Anything less will surely result in lawsuits and more expenses for the Navy.

Coupeville, WA 98239

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated

Why no inflict this noise on unpopulated areas of the Southwest US versus highly populated areas of a national historic reserve?



Coupeville, WA 98239

1.a. Thank You

4.r. Nonauditory Health Effects

The amount of noise caused by this expansion to the town of Coupeville will negatively affect the health of its residents. Consider the fire-fighting foam that was used many years ago and has made so many people sick. I'm sure whoever introduced that feels bad about the harm it caused. In a decade or two there will be a similar health problem in Coupeville related to the extreme noise. Happy to support the Navy - our town wouldn't exist without our military. But this is way too much - and I think everyone knows that.

Coupeville, WA 98239

1.a. Thank You  
2.k. Range of Alternatives

I'm a patriot - but one that assumes our country will balance the needs of the military and the citizens they protect. The new EIS seems out of balance. This many flights into the Coupeville OLF will materially change that community. There has to be a better way.

Coupeville, WA 98239

1.a. Thank You

7.g. Ebey's Landing National Historical Reserve

Ebey's Landing is a \*national historic reserve\* - we should preserve the sound of nature.

Coupeville, WA 98239

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.h. Next Steps

Please add a 60-day comment period after the final Environmental Impact Statement is published. Currently there is no public comment period after today.

Coupeville, WA 98239

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated

We love the Navy - but Oak Harbor is set up for the Navy. Coupeville is not. Please use Nevada or simulators instead.



# Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) *Provide written comments at today's public meeting;* (2) *Speak with the stenographer, who will record your comments;* (3) *Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);* or (4) *Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.*

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name [REDACTED]

2. Organization/Affiliation CITIZEN OF O.H.

3. Address [REDACTED] OH WA 98277

4. E-mail [REDACTED]

5. Please check here  if you would NOT like to be on the mailing list

6. Please check here  if you would like to receive a CD of the Final EIS when available

MY SON-IN-LAW IS A NAVY GROWLER PILOT HERE AT NASWI. HE  
DESERVES THE BEST TRAINING POSSIBLE SO HE CAN SURVIVE THE  
MOST DANGEROUS JOB IN THE NAVY- LANDING ON A CARRIER DECK.  
I WANT HIM TO BE SAFE AND THE BEST PILOT HE CAN BE SO HE  
WILL COME HOME TO MY DAUGHTER AND THEIR NEW-BORN  
DAUGHTER. I AM NOT CONCERNED ABOUT WHERE THEY TRAIN  
AULT FIELD OR OLF, BECAUSE WHEN I MOVED HERE IN 1989  
I OBTAINED THE EXISTING LDM CONTOUR MAP AND BUILT MY  
FAMILY HOME OUTSIDE THE CONTOURS! IF SOMEONE BUYS LAND  
INSIDE THE NOISE ZONE IT WAS THEIR DECISION- BUT DONT

Please print • Additional room is provided on back  
 Please drop this form into one of the comment boxes here at the public meeting or mail to:  
 Naval Facilities Engineering Command Atlantic  
 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

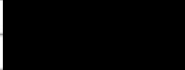
**YOUR INPUT MATTERS**

- 1.a. Thank You
- 3.c. Military Training Routes

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LET THEM DICTATE NAVY PRACTICE FOR OUR YOUNG PILOTS,  
TRAINING IS EVERYTHING AND THEY DESERVE THE BEST TO  
DEFEND OUR COUNTRY AND OUR RIGHTS TO BE MEN  
AMERICANS.

LET THEM PRACTICE DAY AND NIGHT AS MUCH AS THEY ARE  
REQUIRED! I WOULD HATE FOR MY DAUGHTER TO HEAR  
THAT HER DAD'S DADDY WAS KILLED ON THE DECK  
OF A CARRIER BECAUSE OF THE LACK OF PRACTICE!!!



For more information, please visit the project website at [whidbeyeis.com](http://whidbeyeis.com)

Please print

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6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

Sequim, WA 98382

1.a. Thank You  
19.d. Electronic Warfare

I am 100% opposed to the use of the Olympic Peninsula as the location for the Navy to play war games or any military activity whatsoever.



1.a. Thank You

Clinton, WA 98236

We have been residents of Whidbey Island for 35 years. We totally support the proposal for the Navy to continue and expand the Growler operations at Ault Field and Outlying Landing Field Coupeville. Residents of the land beneath the flight patterns acknowledged these patterns when they signed purchase agreement for their properties. It is very important to us to support NAS Whidbey. We wish they still had the slogan 'Pardon our Noise - its the Sound of Freedom' posted at the turnoff to the base at the base of the retired aircraft on display. It is vital for the USA that this NAS function at its fullest capacity. Our freedom as Americans is at stake. Sincerely, [REDACTED]

Port Townsend, WA 98368

Subject: Expanding Navy ONP Growler training To whom it may concern, I am a long time resident of Port Townsend, WA and well within the impact of Navy flyover noise impact. I am also an advocate of the pristine experience available to visitors of the Olympic National Park. I have promoted the park to potential visitors from across the country and this past year two groups came to enjoy the Olympic experience. I purposely did not mention the potential sound impact. However after they returned home I contacted both groups and asked them if the flyover noise affected their enjoyment and both replied yes. I have enclosed a testimonial from my friend and visitor to the West End this late fall, who is from Montana. The Olympic National Park must not be made into the equivalent of the noise impact of living near a fire /ER station in a large city. Not only for the visitors, but the local residents and the wildlife up and down the food chain that depend on quiet to detect predators, find mates, and their species own food acquisition. All depend on the very survival of the fragile web of life that makes the Olympic Park what it is. A treasure protected by its National Park status in the first place. Thank You, [REDACTED], Captain, ret. Port Townsend, WA 98368 To whom it may concern, I visited the west side of Olympic National Park, specifically the Kalaloch Lodge and the Qweets, Quinnalt, and Hoh river valleys on November 1 thru 3, 2016. I was witness to numerous military jet flyovers during that short time. The jet noise was a very loud intrusion on the stillness of my National Park experience. The Olympic National Park has become known as one of the quietest places in the country. This is one important reason I and others go there, to find peace and quiet and the stillness of the old growth forest. That was shattered by the thundering noise overhead. I live close to Glacier National Park and experience that same noise pollution with the helicopter flight seeing operations. We are working to end that intrusion. I rely on these special places to get away from the hustle of modern life and recharge. Please keep them pristine and quiet. Thank you for your consideration, [REDACTED] Whitefish, MT

1.a. Thank You

10.a. Biological Resources Study Area

10.b. Biological Resources Impacts

10.c. Wildlife Sensory Disturbance and Habituation

4.v. Impacts to Domestic Pets, Livestock, or Wildlife

7.d. Recreation and Wilderness Analysis and Study Area

Anacortes, WA 98221

I am against any increase in jet plane traffic over Anacortes. Or any jet aircraft passage over Anacortes at all. The noise is damaging to hearing and the jet exhaust is poisonous to all who live here. Time to take these polluting machines elsewhere, to a desert would be good.

1.a. Thank You

4.q. Potential Hearing Loss

6.a. Air Quality Impacts from Mobile Source Emissions (Jet Engine and Vehicle)

1.a. Thank You

Anacortes , WA 98221

Having trained at Coupeville OLF in the Growler for Carrier Qualifications, the training value of the OLF is immeasurable in keeping pilots safe behind the boat. Without the OLF, safety of both our aircrew and the nation is a risk.

Sequim, WA 98382

1.a. Thank You

4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations

The aircraft noise assessment provided by the US Navy's DEIS is faulty and needs to be redone. The A-Weighted Sound Level scale used to assess noise is attenuated along the range of human hearing. It doesn't account for the noise produced outside of that range, but can still have deleterious effects to humans and other species. No one is even looking at the possible consequences of such effects.

Coupeville, WA 98239

I am writing this to express my firm opposition to the Navy's plans to expand the EA16 Growler aircraft training flights over Whidbey Island and the north Puget Sound area. My particular outrage centers around the effects of proven damaging levels of noise generated by these airplanes flying very low over residential areas. I am making it my mission to focus attention on the most vulnerable victims of this noise: toddlers, infants and fetuses. Despite the Navy's assertion that the noise levels are within safe limits, residents and activists in the Ebey Reserve area of Whidbey Island have measured the sound levels of low-flying Growlers above 115 db. As I am sure you know, 85 db and above is considered unacceptable and potentially permanently damaging to bony, soft tissue and neurologic structures and functions of the human auditory system. At the recent Navy public relations event in Coupeville, I had occasion to speak with a Navy audiologist (no physicians were present at the event as far as I could determine). He expressed stunning ignorance of both the physiology and function of the human auditory system. Even more astounding was the answer I received from another uniformed Navy representative when I asked why studies of the effects of noise on fetuses, infants, toddlers and preteens were not a part of their Draft Environmental Impact Study. His reply: "No one asked us to." Study of the Navy's background examination of this issue clearly show that the Navy did indeed study the effects of fetal noise exposure; however, none of that information found its way into the DEIS. Why not? Medical and scientific information I have been able to find on the internet fills me with further concern. However, I fear that if presented to the Navy by me, little or, most probably, no serious attention will be paid to these facts. Therefore, I have urged Washington Physicians for Social Responsibility to take an active position with respect to responding to the Navy's obvious ignorance and/or dishonesty as well as their omission of this critical public health issue from their draft EIS. It will be necessary for medical and scientific professionals to take a public and medically aggressive stance against the Navy's unnecessary and dangerous plans to subject the North Puget Sound area to the predictable, serious, irreversible public health consequences of this ill-conceived plan. I am urging WPSR to help fill the information gap in the Navy's draft EIS, as well as the frighteningly ill-informed citizens and leaders of Whidbey Island and surrounding areas. I am eager to discuss this and related issues with a representative of WPSR in order to learn how best to focus my concerns about this dangerous situation.

- 1.a. Thank You
- 2.e. Public Involvement Process
- 2.f. Use of Public Comments
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

Coupeville, WA 98239

1.a. Thank You  
12.p. Local Differences in Economy  
2.m. Record of Decision/Preferred Alternative

With regard to the proposed training flight schedule schemes presented by the Navy: None of those, of course, are backed by the majority of residents of Central Whidbey; but about them I will say this: It is clear that at least 80% of the economic benefits of the Navy's plan(s) accrue to Oak Harbor; so it seems entirely appropriate that 80% of the flights occur at NASWI in the skies above Oak Harbor. Therefore, the lesser of several evils would appear to be those schemes that split the flights 80/20 between central and north Whidbey respectively. Alternatively, while aircraft maintenance and ground-based training for pilots can and should be conducted at NASWI, in-air training can and should be carried out at a more appropriate location. I believe that the added expense of making the short trip over the Cascades to practice touch and goes in a much more sparsely populated area in eastern Washington (where commercial airlines train their pilots) would be a win-win situation for both Oak Harbor and central Whidbey. Fairchild Air Force Base west of Spokane comes to mind. Any expenses necessitated by repurposing existing training facilities there would be a reasonable exchange for the health and wellbeing of our citizens, local economy, schools, medical facilities, farms and wildlife. It is well known that NASWI is considered a plum assignment for Navy personnel; however, during my time in the service as a personnel specialist, I never once saw evidence of service personnel's preferences for duty assignments trumping command-level staffing decisions.

Coupeville, WA 98239

I am writing this to express my firm opposition to the Navy's plans to expand the EA16 Growler aircraft training flights over Whidbey Island and the north Puget Sound area. My particular outrage centers around the effects of proven damaging levels of noise generated by these airplanes flying very low over residential (as well as natural) areas. I am making it my mission to focus attention on the most vulnerable victims of this noise: toddlers, infants and fetuses. Despite the Navy's assertion that the noise levels are within safe limits, residents and activists in the Ebey's Prairie Reserve area of Whidbey Island have measured the sound level of low-flying Growlers above 110 db during Little League baseball games under the flight path. It is commonly known that 85 db and above will cause unacceptable and potentially permanent damage to middle and inner ear tissues and neurologic structures and, of course, hearing. At the recent Navy public relations event in Coupeville, I had occasion to speak with a Navy audiologist (no physicians were present at the event as far as I could determine). He expressed stunning ignorance of both the physiology and function of the human auditory system. Even more astounding was the answer I received from another uniformed Navy representative when I asked why studies of the effects of noise on fetuses, infants, toddlers and preteens were not a part of their draft Environmental Impact Study. His reply: "No one asked us to." What scientific information I have been able to find on the internet fills me with further concern. However, I fear that if presented by me, little or, most probably, no serious attention will be paid to these facts. Therefore, I have urged Washington Physicians for Social Responsibility (WPSR) to take an active position with respect to responding to the Navy's obvious ignorance and/or dishonesty as well as their omission of consideration of this critical public health issue from the draft EIS. It will be necessary for medical and scientific professionals to take a public and medically aggressive stance against the Navy's unnecessary and dangerous plans to subject the North Puget Sound area to the predictable, serious, irreversible public health consequences of this ill-conceived plan.

- 1.a. Thank You
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects



Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:

EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

- 1.a. Thank You
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

1. First Name \_\_\_\_\_

2. Last Name \_\_\_\_\_

3. Organization/Affiliation \_\_\_\_\_

4. City, State, ZIP Lopez Island, WA 98261

5. E-mail \_\_\_\_\_

6. Please check here  if you would NOT like to be on the mailing list

7. Please check here  if you would like your name/address kept private

**Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex**

**January, 2017 Comments**

*Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)*

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.  
**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**
2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.  
**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**
3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.  
**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**
4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.  
**Action: Noise levels should only be averaged over active flying days.**
5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.  
**Action: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**
6. The Draft includes some independent noise measurements and ignores others.  
**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**

- 7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

- 8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

- 9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

- 10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

- 11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states “If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.”

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

- 12. Add your own comments here:

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Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

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EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

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- 4.j. Other Reports
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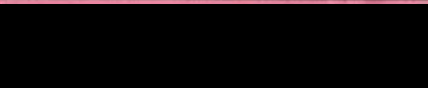
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*EA-18G Growler Airfield Operations at NAS Whidbey Island Complex*

**Comments must be postmarked or submitted online by January 25, 2017**

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1. Name 
2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)  
*RESIDENT, CITIZEN,*
3. Address  *, Coupeville, WA 98239*
4. Email \_\_\_\_\_
5. Phone 
6. Please check here  if you would NOT like to be on the Coupeville Community Allies email list

**Comments**

Check all that concern you. For additional information see [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

- Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture.** Increasing OLF operations by 36 % to 475%, with up to 135 flight operations daily, will double the residential areas and increase by 10-fold the commercial areas impacted by noise. **This is a burden greater than the Coupeville/Central Whidbey community can bear.**
- Increased operations at OLF risk greater aquifer and well contamination.** Wells near OLF have now found to be contaminated with toxic PFOA compounds from Navy firefighting foam which the Navy continues to use for aircraft fires. The extent of contamination has not been determined nor have results been shared with the community. There is no mitigation plan in place.
- The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.**

(over)

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.i. Housing Access and Affordability
- 12.j. Property Values
- 12.m. Education Impacts
- 12.n. Quality of Life
- 13.a. Environmental Justice Impacts
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

- The Navy did not adequately look at siting new Growler aircraft elsewhere, despite this being the #1 request from the community during the Navy's prior scoping forums.
- An additional 880-1,574 personnel and dependents would severely impact our tight housing market, decreasing the already low stock of affordable housing on Whidbey Island.
- Single-siting Growlers at NASWI presents a major terrorist risk to our Island, which is served by one bridge and two ferries. All active electronic warfare jets in the US Military would be at NASWI.
- The Growlers are at risk for more mishaps and crashes due to problems with their onboard oxygen system that can cause pilot hypoxia, with over 100 incidents in all F/A-18 airframes in 2015 alone. Increases in OLF operations increase the risk of crashes on Whidbey Island and in Puget Sound.

Please include any additional comments here:

My husband has undergone two major surgeries these past two years and I believe the "Growlers" cause unhealthy responses to daily living for him.

Sincerely,

What else you can do

1. **Get involved.** To volunteer, email us: [coupevillecommunityallies@gmail.com](mailto:coupevillecommunityallies@gmail.com)
2. **Call (best) or email your elected officials and share your concerns.** The number of calls are important.
  - a. U.S. Senator Patty Murray: 206.553.5545; [www.murray.senate.gov](http://www.murray.senate.gov)
  - b. U.S. Senator Maria Cantwell: 425.303.0114; [www.cantwell.senate.gov](http://www.cantwell.senate.gov)
  - c. U.S. Congressman Rick Larson: 800.652.1385; [rick.larsen@mail.house.gov](mailto:rick.larsen@mail.house.gov)
  - d. Governor Jay Inslee: 360.902.4111; [governor.wa.gov](http://governor.wa.gov)

### To Learn More

- ✓ To receive email updates, or to get involved, **email us** at [coupevillecommunityallies@gmail.com](mailto:coupevillecommunityallies@gmail.com)
- ✓ **Follow us on Facebook at Coupeville Community Allies**
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Freeland, WA 98249

1.a. Thank You

2.n. Alternatives Considered But Eliminated

I was a teacher for children of U.S. Air Force and Navy personnel on Okinawa during the 1966/67 school year, and my husband served as a U.S. Navy pilot, so I have great respect for those serving in the U.S. military. Those living in Oak Harbor and Coupeville have been tolerant of flights, but the Growlers have raised the noise to an intolerable level. Now the Navy plans to add substantially to the number of Growlers, expanding the range into the Olympic National Park, a place of quiet and serenity. Please consider relocating these plans to less populated areas where the noise will have less impact on people and wildlife.



Port Townsend, WA 98368

1.a. Thank You  
4.j. Other Reports

What I am most concerned about as a long-time resident of Port Townsend is the impact of the noise from an increase in the numbers of flights at OLF. The DEIS ignores overwhelming scientific and medical evidence of harms caused by hazardous Growler noise. Growler noise has already created what one health expert labeled a public health emergency. Please do not allow the increase in numbers of flights. Thank you.

**Draft Environmental Impact Statement Comment Form**

*EA-18G Growler Airfield Operations at NAS Whidbey Island Complex*

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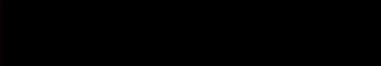
1. Name 

2. Organization/Affiliation (resident, citizen, business, nonprofit, veteran, retired military)

*Resident, Korean War Veteran, Retired*

3. Address  *Coupeville, WA 98239*

4. Email \_\_\_\_\_

5. Phone 

6. Please check here  if you would NOT like to be on the Coupeville Community Allies email list

**Comments**

Check all that concern you. For additional information see [www.facebook.com/whidbeyeis](http://www.facebook.com/whidbeyeis)

**Increases in Outlying Field (OLF) operations will significantly harm our property values, health, schools and quality of life as well as severely impact our primary industries, tourism and agriculture.** Increasing OLF operations by 36 % to 475%, with up to 135 flight operations daily, will double the residential areas and increase by 10-fold the commercial areas impacted by noise. **This is a burden greater than the Coupeville/Central Whidbey community can bear.**

**Increased operations at OLF risk greater aquifer and well contamination.** Wells near OLF have now found to be contaminated with toxic PFOA compounds from Navy firefighting foam which the Navy continues to use for aircraft fires. The extent of contamination has not been determined nor have results been shared with the community. There is no mitigation plan in place.

**The addition of large, new, and undefined Accident Potential Zones (APZs) surrounding OLF will restrict property rights and significantly decrease property values.**

(over)

- 1.a. Thank You
- 11.d. Per- and Polyfluoroalkyl Substances
- 12.e. Agriculture Analysis
- 12.h. Tourism
- 12.i. Housing Access and Affordability
- 12.j. Property Values
- 12.m. Education Impacts
- 12.n. Quality of Life
- 13.a. Environmental Justice Impacts
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.o. Classroom Learning Interference
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.d. Environmental Health Risks and Safety Risks to Children
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

- ✗ The Navy did not adequately look at siting new Growler aircraft elsewhere, despite this being the #1 request from the community during the Navy's prior scoping forums.
- ✗ An additional 880-1,574 personnel and dependents would severely impact our tight housing market, decreasing the already low stock of affordable housing on Whidbey Island.
- ✗ Single-siting Growlers at NASWI presents a major terrorist risk to our Island, which is served by one bridge and two ferries. All active electronic warfare jets in the US Military would be at NASWI.
- ✗ The Growlers are at risk for more mishaps and crashes due to problems with their onboard oxygen system that can cause pilot hypoxia, with over 100 incidents in all F/A-18 airframes in 2015 alone. Increases in OLF operations increase the risk of crashes on Whidbey Island and in Puget Sound.

Please include any additional comments here:

*In addition to the above comments, common-sense concerning our drinking water source is at risk to the health of our communities which include our children, pets, elderly residents and visitors. Please take an honest, comprehensive, examination of the bigger picture in light of geographical convenience.*

### What else you can do

1. **Get involved.** To volunteer, email us: [coupevillecommunityallies@gmail.com](mailto:coupevillecommunityallies@gmail.com)
2. **Call (best) or email your elected officials and share your concerns.** The number of calls are important.
  - a. U.S. Senator Patty Murray: 206.553.5545; [www.murray.senate.gov](http://www.murray.senate.gov)
  - b. U.S. Senator Maria Cantwell: 425.303.0114; [www.cantwell.senate.gov](http://www.cantwell.senate.gov)
  - c. U.S. Congressman Rick Larson: 800.652.1385; [rick.larsen@mail.house.gov](mailto:rick.larsen@mail.house.gov)
  - d. Governor Jay Inslee: 360.902.4111; [governor.wa.gov](http://governor.wa.gov)

### To Learn More

- ✓ To receive email updates, or to get involved, **email us** at [coupevillecommunityallies@gmail.com](mailto:coupevillecommunityallies@gmail.com)
- ✓ **Follow us on Facebook at Coupeville Community Allies**
- ✓ Review the Draft EIS and appendices at [www.whidbeyeis.com](http://www.whidbeyeis.com)

All comments submitted by January 25, 2017 will become a part of the public record and will be addressed in the final EIS. Personally identifiable information of individuals will be kept confidential and not released, unless otherwise specifically indicated by the commenter or as required by law. City, state and five-digit zip code of individuals who provide comments may be released.

Wenatchee , WA 98801

As a property owner on Whidbey Island I am opposed to additional Growler flights at OLF. The current impact is excessive and dangerous to human health, with noise impacts being the primary concern. Water quality impacts are also a concern. The increased noise due to the Growlers is incompatible with a residential community.

- 1.a. Thank You
- 11.a. Groundwater
- 11.b. Floodplains and Wetlands
- 4.r. Nonauditory Health Effects

Victoria, British Columbia V9E2C5

Dear NAS Whidbey Island: There was a significant amount of air noise today. Every hour or so planes taking flight. We live in Victoria BC Canada and my children were very alarmed. We live on a small farm, and each the time rumble came time our animals were cowering or running for cover. I went looking for information about the noise, and ended up here. I am familiar with the noise, from times when your aircraft carriers are moored in the roads off Vancouver Island, so while it was annoying it was not as alarming for me. With this in mind, and now reading that you are planning to significantly increase plane traffic, I am writing to ask what the plans are to notify local residents of this change? Is there a way to be notified of high flight days, so I can warn my children and guests, that the noise is not a threat? For us the days we hear it are when the prevailing winds come this way. But with many, many more flights scheduled the noise pollution will increase significantly. As a city and a family that depends on tourism this has a significant impact. We would deeply appreciate being notified of high flight volume dates. Sincerely, [REDACTED]

- 1.a. Thank You
- 12.h. Tourism
- 2.e. Public Involvement Process
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

[REDACTED]  
Seattle, WA 98109  
[REDACTED]

- 1.a. Thank You
- 10.b. Biological Resources Impacts
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.k. Range of Alternatives
- 4.m. Supplemental Metrics
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife

EA-18G EIS Project Manager  
Naval Facilities Engineering Command (NAVFAC)  
Atlantic, Attn: Code EV21/SS  
6506 Hampton Blvd.,  
Norfolk, VA 23508

Commander U.S. Fleet Forces Command  
1562 Mitscher Avenue, Suite 250  
Norfolk, VA 23551-2487

January 12, 2017

Dear Naval Facilities Engineering Command,

I am writing to you to comment on the proposed expansion of Growler jets to the NAS Whidbey Island complex in Washington State.

The impact of jet noise on the communities is intolerable to the people living in the region. The wildlife habitat in Washington's extraordinary federal and state public lands, are also damaged by the disturbance caused by the jets flying near by.

In Seattle there was an airfield on Lake Washington during World War II. It played a critical role at the time to support the war efforts, but as time moved on it was no longer an appropriate location for flight activities. The same scenario applies here. Washington's population in the Puget Sound region and the Olympic Peninsula can no longer support or tolerate noise from the loudest jet on the planet. The Growler is intended to intimidate and psychologically harm people, and it is not an appropriate jet to be flying in Western Washington. If a switch could quiet the Growler, they would perhaps be tolerable.

Additionally, the Draft Decision Notice Finding issued by the Forest Service on November 29, 2016 of No Significant Impact issued by District Ranger Millet is in error. In a separate correspondence I request the Forest Service withdraw the Draft Decision. The Forest Service failed to fully respond to the National Park Conservation Association's and others requests for more information. A copy of that correspondence is enclosed.

As a frequent visitor to Olympic National Park and also a resident of the San Juan Islands, I feel the Forest Service must comply with practices that protect the public's interest in Washington's forest lands. Those public lands will be negatively affected with extraordinarily loud jet noise during the expanded activities of the Pacific Northwest Electronic Warfare Range program. The Forest Service has not recognized the impact of noise on forest service land, wildlife habitat, the surrounding public lands, Olympic National Park and the local communities. The procedures established to engage, inform and disclose to the public were not fully implemented as required by law.

Thank you for your attention to these matters.

Sincerely yours,



Enclosure: January 11, 2017, CK letter to Forest Service related organizations accepting comments as part of the permit process.

[REDACTED]  
[REDACTED]  
Seattle, WA 98109  
[REDACTED]

January 11, 2017

Greg Wahl  
Olympic National Forest Environmental Coordinator  
1835 Black Lake Blvd. SW  
Olympia, WA 98512  
[gtwahl@fs.fed.us](mailto:gtwahl@fs.fed.us)

Dean Millet  
District Ranger, Pacific Ranger District  
Olympic National Forest  
353 S. Shore Rd.  
Quinalt, WA 98575

Reta Laford  
Reviewing Office  
1835 Black Lake Blvd  
Olympia, WA 98512

Melani Gonzalez  
Regional FOIA/Privacy Act Coordinator  
1220 SW 3<sup>rd</sup> Ave  
RPM- Suite 1600  
Portland, OR 97204  
[melanirgonzalez@fs.fed.us](mailto:melanirgonzalez@fs.fed.us)

Re: Withdrawal of November 29, 2016 Draft Decision Notice and FONSI Pending Complete Response to NPCA's June 10, 2016 FOAI Request

Dear Mr. Wahl, Dist. Ranger Millet, Ms. Laford and Ms. Gonzalez,

I have read the correspondence sent to you by Tom Buchele of Earthrise Law Center dated December 16, 2016. I fully support the National Park Conservation Association's (NPCA) engagement of Mr. Buchele to advocate for further review of the Special Use Permit related to the Pacific Northwest Electronic Warfare Range.



The Draft Decision Notice Finding issued on November 29, 2016 of No Significant Impact issued by District Ranger Millet is in error, and I request the Forest Service withdraw the Draft Decision. The Forest Service failed to fully respond to the National Park Conservation Association's requests for more information.

As a frequent visitor to Olympic National Park and also a resident of the San Juan Islands, I feel the Forest Service must comply with practices that protect the public's interest in Washington's forest lands. Those public lands will be negatively affected with extraordinarily loud jet noise during the expanded activities of the Pacific Northwest Electronic Warfare Range program. The Forest Service has not recognized the impact of noise on forest service land, wildlife habitat, the surrounding public lands, Olympic National Park and the local communities. The procedures established to engage, inform and disclose to the public were not fully implemented as required by law.

**36 CFR § 218.11 Resolution of objections.**

*(a) Meetings. Prior to the issuance of the reviewing officer's written response, either the reviewing officer or the objector may request to meet to discuss issues raised in the objection and potential resolution. The reviewing officer has the discretion to determine whether adequate time remains in the review period to make a meeting with the objector practical, the appropriate date, duration, agenda, and location for any meeting, and how the meeting will be conducted to facilitate the most beneficial dialogue; e.g., face-to-face office meeting, project site visit, teleconference, video conference, etc. The responsible official should be a participant along with the reviewing officer in any objection resolution meeting. Meetings are not required to be noticed but are open to attendance by the public, and the reviewing officer will determine whether those other than objectors may participate.*

As requested by NPCA and others, please hold additional meetings that are required to discuss the use of Washington's public lands and the negative impacts of jet noise.

Sincerely,

A large black rectangular redaction box covering the signature and name of the sender.

Friday Harbor, WA 98250

1.a. Thank You

4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations

Please do not add any more Growler traffic to the shies in the Pacific Northwest. I live on the south end of San Juan Island. We had an earthquake a fe weeks ago in the early afternoon, and I thought it was Growler traffic. It;s so loud that at times our windows rattle. I moved to the island for peace and quiet, off the beaten path 35 years ago. The noise is unacceptable. Thank you for reading my comments.

Coupeville , WA 98239

My well water has been poisoned by the navy. I have a severely disabled, fragile daughter who has been consuming this water through her feeding bag for 9 years along with my entire family including my pregnant daughter and grandkids. Plus the noise from the Jets until midnight is unbearable.

1.a. Thank You  
11.d. Per- and Polyfluoroalkyl Substances  
4.p. Sleep Disturbance

Bellingham, WA 98226

As someone who has visited and loved Olympic National Park frequently since I was 10 years old (I'm 73), I am appalled to learn of the proposed war games over large areas of the Park. Following are comments on the Draft Environmental Impact Statement put together by friends who are protesting these "games." 1. The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP). 2. The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance. 3. The DEIS claim that the JGL noise study was "flawed" is disingenuous and unsupportable, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data. 4. The DEIS misconstrued important finding of the National Park Service's 2015 noise study at Ebey's Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconception has to be credibly revised to properly characterize the real impacts. 5. Much like the tobacco industry did years ago, the DEIS selectively and reprehensibly cites and relies on out-of-date medical research findings on impacts of noise on human health that are at odds with the overwhelming body of contemporary research. This obfuscation renders the DEIS findings incomplete and disingenuous and demands an honest, complete, forthright evaluation of the contemporary formal medical literature. 6. The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined "hazardous noise zone" threshold (i.e., an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month). 7. Island County has unconscionably ignored the Navy's 2005 AICUZ land-use directives for Outlying Field Coupeville, especially as reflected by construction permits issued in Noise Zone 2 areas, where the AICUZ stipulates no residences should occur, as well as other land uses. Whether due to the County's willful intent to ignore or due to lack of Navy assertiveness, it aptly demonstrates the meaningless and ineffectiveness of the AICUZ and similar land-use provisions in the DEIS. Given the alternatives under consideration in the DEIS, the Navy should immediately advocate that the County place a moratorium on all construction permits not compatible with the 2005 AICUZ and DEIS land-use stipulations until the final EIS is approved. 8. The two most dangerous aspects of flying are the approach, landing and takeoff — in other words most of the OLFC flight path. The risks are significant (a) because of unrestrained and major encroachment problems, (b) because OLFC is about 49,000 acres below and the runway about 3000 feet short of FCLP standard for Growlers, (c) because the pilots are mostly students flying the F-18 airframe which is 5.5 times more likely to crash than its EA-6B (Prowler) predecessor, and (d) FCLP operations occur at low elevations that increase likelihood of bird strikes exacerbated by the significant shoreline bird population. These risks cannot be mitigated other than by moving the FCLPs to a suitable 21st century off-Whidbey site. 9.

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.k. Aircraft-Wildlife Strike and Hazing/Lethal Control of Wildlife
- 11.d. Per- and Polyfluoroalkyl Substances
- 13.a. Environmental Justice Impacts
- 19.d. Electronic Warfare
- 2.f. Use of Public Comments
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 3.b. Flight Tracks and Federal Aviation Administration Regulations
- 3.e. Field Carrier Landing Practice Patterns
- 4.a. General Noise Modeling
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports
- 4.o. Classroom Learning Interference
- 4.p. Sleep Disturbance
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 7.b. Land Use Compatibility and Air Installations Compatible Use Zones

Environmental Justice analysis overlooked the fact that farm workers, gardeners, and recycle center workers are almost entirely composed of low-income and/or ethnic minorities, and because they must work outside, they are disproportionately affected by overhead Growler noise. 10. Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the related past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of the impacted wells. Leakage of PFAS in storage or their use in a crash event is a hugely relevant environmental impact that must be addressed. And the public must be given the opportunity to comment. 11. The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was relatively complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% use projection of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected. 12. The DEIS fails to address the potential effects of sleep disturbance due to Growler overflights, despite the admission that there will be an increase in the “percent probability of awakening for all scenarios...” While music torture is still permitted under US law, the United National Convention against Torture defines torture as “any act by which severe pain of suffering, whether physical or mental...” Sleep disturbance results in serious physical and emotional symptoms such as cognitive impairment, impaired immune system, adverse birth outcomes, risk of heart disease, risk of diabetes, not mentioning the number of work hours/days lost from lack of sleep. The DEIS must forthrightly address the impacts of sleep disturbance on residences affected by OLFC night operations. 13. The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states, “Noise can pose a serious threat to a child’s physical and psychological health, including learning and behavior,” but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and reanalyzed. 14. The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated. 15. The DEIS fails to adequately address the effects of high noise levels during pregnancy that provoke significantly higher risk for smaller newborns, gestational hypertension, cognitive abnormalities, and permanent hearing loss. Each of these noted item should have led to a re-examination of the plan for these war games. Taken together, they evidence extreme disregard of civilian health on the part of the Navy. Please cancel these proposed war games. There must be better and safer places to train your pilots. Thank you for considering my comments. Sincerely,

██████████ Bellingham, WA 98226

1.a. Thank You

Oak Harbor, WA 98277

I live within a mile and a half of the Navy base and have plane's fly over my house all the time when they are practicing and it doesn't bother me at all! They have been doing training on this Island longer than most of us have been alive!! It is very vital to there Safety and our Freedom to practice practice practice and if I didn't like it I would move away plain and simple,this is where the Navel Air Base is and has been and the Ault Field should be kept open to practice there Carrier landings so the other run ways can stay open! I can say I am not a military person but I do feel the importance of them here on the Island.

Edmonds, WA 98020

It is a travesty and a danger to use the Olympic Peninsula and our precious Olympic National Park as a practice ground for the military. The destruction of the property, the noise, and the enormous pollution caused by planes and vehicles will destroy this natural national treasure, endanger the wildlife and lessen the quality of life for all American citizens who visit the Park in peace. Don't do it! Please!

1.a. Thank You

19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training

7.d. Recreation and Wilderness Analysis and Study Area

Oak Harbor, WA 98277

When I moved to the north side of Duguella Bay in 2006 most Prowler & Growler flights stayed to the south end of the bay and did their touch and go patterns on that side. The only change came when the OLF was shut down for a year. This year however their have been a lot more flights directly over my home. Folks who live by commercial airports know the flight patterns in advance and can then make an informed decision of where they buy property. If the Navy is going to keep changing up their flight patterns then civilians cannot accurately purchase a home knowing the noise pattern. This is very nerve racking to home owners in the area. There is plenty of water to fly over around here, but the Navy chooses to fly directly over homes when it doesn't have to. Now you add in the groundwater pollution in and around the Navy base and OLF. This island is environmentally fragile and people only have certain areas they could live.

- 1.a. Thank You
- 11.a. Groundwater
- 11.d. Per- and Polyfluoroalkyl Substances
- 3.a. Aircraft Operations



Anacortes, WA 98221

While I am reluctant to support any increase in the already intolerable jet noise when the jets fly directly over my home, I realize that requesting that the Navy adopt the No Action Alternative would not be seriously considered. Had I known that Fidalgo Island is subjected to jet noise, I would not have built my home in Anacortes near Washington park. The jets fly directly over my home which is unacceptable as this has a negative impact on my quality of life as well as my pets. Reality is that the jets are already here and the Navy will add the add'l 35/36 aircraft. With that in mind, I would support the plan which appears to have the least impact to my surrounding neighborhood. Action Alternative I, Scenario A

1.a. Thank You

12.n. Quality of Life

2.l. No Action Alternative

2.m. Record of Decision/Preferred Alternative

Anacortes, WA 98221

- 1.a. Thank You
- 2.l. No Action Alternative
- 2.m. Record of Decision/Preferred Alternative

I have reviewed all of your proposed alternatives and my preference is No Action Alternatives. As a second alternative and comprise Action alternative 1, Scenario A.

Port Townsend, WA 98368

Attention: EA-18G Growler EIS Project Manager. I recently attended a public meeting conducted by the Navy on this topic. While the meeting was well organized, it obscured numerous items of great concern to those in attendance. In addition, the Draft EIS (DEIS) purposely both, presents confusing information, and avoids responsibility for illegal procedures. I refer to the following damaging facts: 1. Failure to Consider All Impacts: Noise and emissions over populated, historic and National Park areas. I have personally been awakened at night by Growler flights - this before the hidden increase to 160 aircraft. 2. Failure to Consider All Alternatives: The "no action alternative" claimed in the DEIS is not a good faith effort to explore alternatives. Other DOD properties, where impact to private and public lands would be minimal or non-existent, have not been properly explored or documented. 3. Inadequate Consideration of Impact on Endangered Species: The Navy has failed to consult with the US Fish and Wildlife Service on impacts to wildlife, particularly threatened or endangered species. 4. Public Health: Both noise and radiation from Growler operations will expose people to adverse health impacts. In particular, the DEIS misleads by failing to completely quote studies linking radiation to childhood leukemia. In addition, the studies for the DEIS used outdated, misleading and scientifically invalidated methods of noise measurement. 5. Improper Segmentation of Activities: The Navy has mislead readers of the DEIS by discussing only portions of the impacts, rather than the impact of total operations. Mr. / Ms. Manager: As a citizen of Western Washington, I am appalled that the Navy seeks to conduct and expand operations which are detrimental to our way of life and environment. It is my belief that the Navy will proceed with their intended plans regardless of the opinion of the population. If the intent is to increase security of the United States, understand that we consider our health and happiness an essential part of our security. Proceeding without proper consideration of these aspects of security will have a negative impact on the regard we have for Navy plans and operations. Sincerely, Dr. [REDACTED]

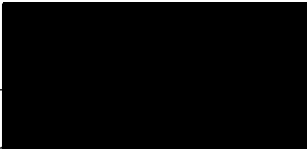
- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.f. Endangered Species Impact Analysis Adequacy
- 10.m. Impacts to Marine Species and Habitat
- 19.d. Electronic Warfare
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.l. No Action Alternative
- 4.r. Nonauditory Health Effects


Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Fill in and mail with comments to:  
EA-18G EIS Project Manager  
NAVFAC Atlantic Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508


- 1.a. Thank You
- 10.m. Impacts to Marine Species and Habitat
- 12.a. Socioeconomic Study Area
- 12.h. Tourism
- 12.j. Property Values
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated
- 4.b. NOISEMAP Model, Modeling Methodology, and Noise Sources
- 4.c. Advanced Acoustic Model
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.h. C-Weighted Noise, Low Frequency Noise, and Vibrations
- 4.j. Other Reports
- 4.r. Nonauditory Health Effects
- 4.t. Noise Mitigation
- 7.h. San Juan Islands National Monument

1. First Name 

2. Last Name 

3. Organization/Affiliation \_\_\_\_\_

4. City, State, ZIP Lopez Island, WA 98261

5. E-mail 

6. Please check here  if you would NOT like to be on the mailing list

7. Please check here  if you would like your name/address kept private

**Draft Environmental Impact Statement for EA-18G "Growler" Airfield  
Operations at Naval Air Station Whidbey Island Complex**

**January, 2017 Comments**

*Note: For Draft EIS page citations and supporting references see [www.QuietSkies.info](http://www.QuietSkies.info)*

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.

**Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).**

2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.

**Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.**

3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.

**Action: Redo the noise simulation using the more recent Advanced Acoustic Model.**

4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.

**Action: Noise levels should only be averaged over active flying days.**

5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.

**Action: Recognize the impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."**

6. The Draft includes some independent noise measurements and ignores others.

**Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.**

- 7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

**Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.**

- 8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

**Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.**

- 9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

**Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.**

- 10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

**Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.**

- 11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states “if a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.”

**Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.**

- 12. Add your own comments here:

*I am opposed to all Growler activities but if they must fly over our San Juan islands, please use measures that accurately evaluate the effects on humans and marine wildlife.*

Anacortes, WA 98221

I reside in Anacortes, WA and am dismayed by the flight pattern of jets over my home right in town here. I purposely live here and away from Whidbey because of the jet noise and enjoy the peace and quiet this area used to offer. Based on the maps in the study, we should not even have jets flying over our homes. It has been going on for quite some time and my husband and I cannot even hear the TV inside with the windows CLOSED much less enjoy an afternoon in the backyard without jet noise often. The "simulation" models you are using must be flawed. At the beginning of the EIS it says "affected region" is Island County. Well, we all know that Skagit County is affected in a major way. Please find an area where the Growlers can practice that is away from school children, ANIMALS and WILDLIFE, incredibly scenic and beautiful waterways and farming areas. Give Island and Skagit Counties a break! Thank you.

- 1.a. Thank You
- 2.n. Alternatives Considered But Eliminated
- 3.a. Aircraft Operations
- 4.e. Day-Night Average Sound Level Contours and Noise



## Public Meeting Comment Form

Thank you for attending the public meeting on the *Draft Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island Complex.*

To be most helpful, your comments should be clearly written and describe specific issues or topics. Comments may be submitted in one of the following four ways: (1) *Provide written comments at today's public meeting;* (2) *Speak with the stenographer, who will record your comments;* (3) *Submit your comments on the project website at [www.whidbeyeis.com](http://www.whidbeyeis.com);* or (4) *Write your comments and mail them to: Naval Facilities Engineering Command Atlantic, 6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS.*

All comments submitted on the Draft EIS by January 25, 2017, will become part of the public record and will be addressed in the Final EIS. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

1. Name
2. Organization/Affiliation U.S. Citizen
3. Address  Port Townsend, WA
4. E-mail
5. Please check here  if you would NOT like to be on the mailing list
6. Please check here  if you would like to receive a CD of the Final EIS when available

My concern is the increase in the number of Growlers that will be flying over Port Townsend & surrounding community. As a result the noise level will increase with more jets flight events. Presently, when a Growler flies overhead my house shakes and conversations are interrupted by the sound. The effect of the noise on the migrating birds does not appear to have been thoroughly evaluated. I was told by the Navy rep today that funding did not allow for that. The ~~the~~ Navy intends to fly over critical migratory routes - The Olympic National Park & →

Please print • Additional room is provided on back

Please drop this form into one of the comment boxes here at the public meeting or mail to:

Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

**YOUR INPUT MATTERS**

- 1.a. Thank You
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 12.h. Tourism
- 12.o. Cost-Benefit Analysis
- 2.c. Compliance with the National Environmental Policy Act
- 2.k. Range of Alternatives
- 4.n. Speech Interference (Indoor and Outdoor)
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife



All comments must be received by January 25, 2017. The names, street addresses, email addresses and screen names, telephone numbers, and other personally identifiable information of individuals who provide comments will be kept confidential and will not be released, unless otherwise specifically indicated by the commenter or as required by law. The city, state, and five-digit zip code of individuals who provide comments may be released.

The surrounding waters. The impacts of this can not be neglected!

Concern: The noise level in a National Park where people go to escape the sounds ~~of the surrounding waters~~ ~~of the surrounding waters~~ ~~of the surrounding waters~~ ~~of the surrounding waters~~

The "escape" to such a park is "priceless" in terms of the (expected) quietude.

A question: The impacts noise in the Park will have on the tourist industry which the local communities rely on.

Has a cost analysis been completed regarding any savings the Navy may incur by not flying the extra 400 miles to present sites for warfare training versus the effects I've presented here - effects on the people, ~~and~~ birds, as well as ~~and~~ marine life & forest animals, all affected by the noise, possibly the electromagnetic radiation. This peninsula is a precious environment, one certainly worth defending. Is the Navy acting in the best interest of all living creatures there?

For more information, please visit the project website at [whidbeyeis.com](http://whidbeyeis.com)

Please print

Please drop this form into one of the comment boxes here at the public meeting or mail to:  
Naval Facilities Engineering Command Atlantic  
6506 Hampton Boulevard, Norfolk, VA 23508, Attn: Code EV21/SS

YOUR INPUT MATTERS

1002860.0041.10

Whidbey 2016\_Comment Sheet at GRA-6/23/16

1.a. Thank You

Oak Harbor, WA 98277

I support the Navy's mission on Whidbey Island and the reasonable disruptions that any training operations may create.

## 1.a. Thank You

Coupeville, WA 98239

To whom it may concern; The Mayor of Coupeville, Washington sent out a letter to property owners in the general area regarding the usage of OLF Coupeville outlining various channels to provide comment; public meetings, email or a letter to the Navy Facilities Engineering Command. Please accept this as my correspondence regarding and in support of OLF Coupeville. My wife and I own several properties in and around the "noise zone" and are completely in support of the continued use of the OLF and the expansion of that use as needs and priorities evolve. The Navy has been an important part of the Island community for many years and virtually everyone living on the Island is well aware of the Navy presence and importance of the Navy to both the local economy and the security of our nation. There is a very small vocal group, very few of which have lived on the Island for any extended period of time, that are anti military, anti Navy and will shout down anyone who resists their bullying tactics. Keep up the great work and keep them flying! [REDACTED] Adjunct Professor, Seattle Pacific University Office; [REDACTED] Seattle 98105 [REDACTED]

1.a. Thank You

Nordland, WA 98358

I want to add my support to the activities of NAS Whidbey Island. Readiness is only achieved through drill and practice. A little noise once in a while is well worth the returns in readiness!! Go Navy! [REDACTED]

[REDACTED]  
Forks, WA 98331

February 20, 2017

EA-18G EIS Project Manager  
Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS  
6506 Hampton Blvd.  
Norfolk, VA 23508

**Re: Draft EIS for EA-18G Growler airfield operations at Naval Air Station (NAS) Whidbey Island**

*I admit to using much of the research by the Sierra Club herein (It's good!), and put my individual thoughts in italics. I hereby adopt what the Sierra Club has used herein, after reading it. As a resident of Forks, Washington and frequent user of Olympic National Park, in particular the coastal strip, I am commenting on this draft EIS that would expand existing EA-18G Growler operations at the NAS Whidbey Island by adding 35 or 36 aircraft to support expanded electronic warfare exercises on OLFC on Whidbey Island and in the San Juans, Puget Sound, Olympic Peninsula, and adjacent areas. While I support the need for adequate military training, I also support a fair and open public process that protects public health and the environment.<sup>1</sup> Unfortunately, the Navy's draft EIS fails to do so as described below:*

The Draft EIS Improperly Segments the Navy's Expansion of Growler Activities

The Draft Environmental Impact Statement (EIS) is deficient in not addressing 40 additional Growlers that are in the process of delivery beyond the 35 or 36 identified in the Proposed Action.

The Navy has, to date, piecemealed its aircraft training and testing activities affecting Whidbey Island, the San Juans, and the Olympic Peninsula into multiple separate actions:

1. 4 squadrons of P-8A Poseidon Multi-Mission Aircraft;
2. A 2005 EA (57 Growler jets); 2010 EIS (reaffirming the 57 Growlers that replaced Prowlers);
3. 2012 EA (26 Growlers including 5 from a reserve unit);
4. 2014 EA (Growler electronic warfare activity);
5. 2015 EIS discussing electronic warfare training and testing activity;

<sup>1</sup> All public agencies, including the Armed Services and the Department of Defense, should strive to protect the integrity of human and natural communities (and that) military training and preparedness should be pursued in ways that avoid or minimize adverse effects.

- 1.a. Thank You
- 1.c. Segmentation and Connected Actions
- 10.a. Biological Resources Study Area
- 10.b. Biological Resources Impacts
- 10.c. Wildlife Sensory Disturbance and Habituation
- 10.f. Endangered Species Impact Analysis Adequacy
- 10.k. Aircraft-Wildlife Strike and Hazing/Lethal Control of Wildlife
- 12.c. Socioeconomic Impacts
- 12.h. Tourism
- 12.n. Quality of Life
- 18.d. Washington State Greenhouse Gas Goals
- 19.c. Olympic Peninsula, Olympic National Park, and at-Sea Training
- 19.d. Electronic Warfare
- 2.b. Scope of the Environmental Impact Statement and Analysis Conducted
- 2.c. Compliance with the National Environmental Policy Act
- 2.d. Program of Record for Buying Growler Aircraft
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.k. Range of Alternatives
- 2.l. No Action Alternative
- 2.n. Alternatives Considered But Eliminated
- 3.h. Runway Usage, Flight Tracks, and Altitudes
- 4.a. General Noise Modeling
- 4.d. Day-Night Average Sound Level Metric
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.g. Average Annual Day/Average Busy Day Noise Levels
- 4.l. Points of Interest
- 4.m. Supplemental Metrics
- 4.p. Sleep Disturbance
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville
- 5.e. Lack of First Responders at Outlying Landing Field Coupeville
- 8.a. Cultural Resources Area of Potential Effect
- 8.b. Section 106 Process
- 8.c. Noise and Vibration Impacts to Cultural Resources
- 8.j. City of Port Townsend Cultural Resources

6. The current 2016-2017 DEIS (36 Growlers);
7. And, a seventh likely process, as confirmed by a Navy official at a recent open house, for 42 more jets to bring the Growler fleet total to 160.

As a result, it has been impossible for the public to know just how many Growlers there would be, or what their impacts would be, or what limits, if any, the Navy intends to establish to protect human health and the environment. Furthermore, this piecemeal approach to public involvement violates NEPA as 40 C.F.R. § 1502.4 "...does not allow an approach that would permit dividing a project into multiple 'actions,' each of which individually has an insignificant environmental impact, but which collectively have a substantial impact."

In public meetings, the Navy referred to these increases in Growler activities as "adjustments" to its mission, but "adjustments" to functionally and geographically related activities, each of which when taken individually might not rise to the level of "significance," are significant when taken together. This segmentation represents a significant but hidden erosion of environmental protection and public health. Citizens, elected officials, and tribes have reminded the Navy for years that its segmentation of impacts violates both the law and the public trust, but the Navy continues to ignore these concerns.

*It has been my personal experience that these planes fly so low, that they are louder than the air traffic I lived amid in Chicago for nearly 30 years. It is hard to believe they don't affect our mental wellbeing, since they are so loud they can be heard over entertainment media. Conversation often simply stops while they do their loud exercises nearby. The stress on animals is probably similar. That no empirical tests have been conducted to prove this is a factor of funding, but that does not remove the likelihood. One only has to hear them to know what I refer to. It's like we are living in a war zone. Sometimes the planes fly after 9 p.m. Really. It definitely can wake anyone who might hit the sack early either because a youngster or a timber worker who rises early.*

*Last summer I took a guest to Kalaloch Beach and then the growlers went over. It was so disruptive, we could not enjoy the quietude of nature, obviously, so just left.*

#### The Draft EIS Fails to Consider All Impacts

The draft EIS only analyzes potential impacts for 35 or 36 of potentially 160 Growlers, and is further confined to evaluating impacts only to areas immediately surrounding the runways. However, jet noise, emissions and other impacts from Growler operations adversely affect a wide area including Olympic National Park, state parks, tribal and private lands as well as Puget Sound and endangered Orcas and other species.

By failing to enlarge the scope of its analysis beyond Naval Air Station Whidbey Island, the DEIS also violates NEPA by not considering all the interdependent parts

of a larger action: Growler operations cannot proceed without takeoffs and landings, regional overflights, broadly distributed noise impacts, etc. By failing to consider these additional impacts, the DEIS also fails to evaluate cumulative effects as required by NEPA.

#### The Draft EIS Fails to Consider All Alternatives

The Navy has not made a good faith effort to explore other alternatives as NEPA requires in 540 CFR 1502.14 (a). All of the Navy's 'alternative' scenarios will increase noise, harm to health, and other adverse impacts. The Navy's "no action alternative" would continue Growler operations that currently expose people in homes, schools, parks and businesses to noise that exceeds community standards set by the State of Washington, the EPA, the Occupational and Health Administration (OSHA), and the World Health Organization. No genuine "no-action" alternative is proposed that would address these impacts. Furthermore, the draft EIS violates basic NEPA procedures, as it appears to improperly reflect procurement and operational decisions already made by the Navy.

#### Increased Air Emissions and Worsening Effects on Climate Change Not Adequately Addressed

Growler jets use an extraordinary amount of fuel--a single Growler jet's emissions dwarf what thousands of citizens seek to reduce voluntarily by choosing to use electric cars, add solar collectors to their homes, and conserve energy in other ways. In its continuing and planned expansion of the Growler fleet, the Navy has ignored the cumulative impact of Growler emissions, including their effects on climate change. The military is the world's largest single user of fossil fuels, and exhaust emissions beyond the narrowly defined affected areas near runways are not being analyzed and should be.

#### The Navy Has Failed to Document that DOD-Owned Lands Are Unsuitable or Unavailable for Growler Operations

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to examine non-Whidbey Island sites to conduct flight carrier land practice (FCLP). Instead, it continues to assume that an outdated and dangerously small World War II landing strip on Whidbey, the OLFC, can be used for an increasing number of Growler and other training flights.<sup>2</sup>

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<sup>2</sup> Unfortunately, this failure represents a continuing pattern and is consistent with the Navy's previous decisions regarding its request for a permit from the USFS to conduct electronic warfare missions on the Olympic Peninsula. In this instance, the Navy never adequately substantiated its need for non-Defense Department lands or that DOD lands were either unavailable or unsuitable, which was the primary requirement of a 1988 DOD-USDA Master Agreement.

The two most dangerous aspects of flying are the approach, landing and takeoff. Because the OLFC is about 49,000 acres smaller and 3,000 feet short of the Growler standard for these maneuvers, it places nearby schools, hospitals, residences, a state ferry terminal and parks, and a state conference center at serious risk of accidents. This risk is greatly increased because FLCP maneuvers are, by their nature, conducted at low elevations where collision with birds is likely to occur, particularly since much of the surrounding area is a protected habitat for shore birds.

The draft EIS, itself, acknowledges that one of the runways at OLFC has an “unacceptably steep angle of bank” and can only be used 30 percent of the time due to weather conditions. Yet knowing this, the Navy is significantly increasing the number of flights there and placing nearby communities at harm.

*Not to mention putting your servicemen and pricey planes at risk.*

#### Impact on Threaten Endangered Species Not Adequately Addressed

The Navy needs to provide a more detailed and specific response on whether and how the additional Growlers will affect endangered species, particularly marbled murrelets, given that the acknowledged lack of scientific information on noise impacts to this species affects the ability to determine harm and cumulative effects. This is particularly urgent in light of their precipitous decline and the December 2016 decision by the State of Washington to reclassify marbled murrelets from threatened to endangered.

*I regret only listed species get attention. These growlers probably disrupt elk herds, deer, and birds of many species. (Besides us humans, and you know we are disrupted or you would not be getting all these comments!)*

More generally, by failing to initiate consultation under Section 7 of the Endangered Species Act with the US Fish and Wildlife Service on the potential impacts from the significant increase in Growler flights, the DEIS fails to evaluate direct, indirect and cumulative impacts on threatened and endangered species.

#### Inadequate Consideration of Public Health Impacts

Growler jets utilize the latest electronic warfare capabilities yet the risk of exposure to people and wildlife from downward-directed radiation is not considered. The only discussion was a brief mention in a 2014 EA, in reference to radio transmitters on mobile emitter trucks and the stationary transmitter at Pacific Beach on the Olympic Peninsula. In that document, the Navy referenced a paper and concluded that links from radiation exposure to leukemia were speculative, when in fact, that same paper stated unequivocally that there are direct links between radiation exposure and childhood leukemia. Despite this, any mention or discussion of risks from exposure to electromagnetic radiation from Navy jets is completely missing from all discussions of potential impacts.



appears to be an averaging of sound levels over long time periods that does not adequately capture the real time experience of brief but more numerous exposures to higher decibel levels, as well as the cumulative effect of these events.”

Additionally, the addition of Growlers will have a deleterious effect on the economy of the region. The region is heavily dependent on recreation and tourism and Washington's overall economy is heavily dependent on tourism and outdoor recreation, accounting for: \$22.5 billion annually, 227,000 direct jobs, and \$1.6 billion in tax revenues.<sup>5</sup> Accordingly, any expansion of the Growler fleet needs to address potential job loss, economic harm, and state revenue loss from decreased tourism and outdoor recreation.

Conclusion

For all of the deficiencies, omissions, and failures to properly implement NEPA, as cited above, I ask the Navy to issue a revised, second draft EIS with a new public comment period, and appreciate the opportunity to comment on this draft EIS.

Sincerely,

[Redacted signature]

[Redacted contact information]

---

<sup>5</sup> Outdoor Industry Association

1.a. Thank You

Forks, WA 98331

The growlers are frequent, disruptively noisy, and not clear why increase is essential, or flight path over Park. Will be sending letter.

Olga, WA 98279

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP)

Olga, WA 98279

1.a. Thank You

4.d. Day-Night Average Sound Level Metric

4.g. Average Annual Day/Average Busy Day Noise Levels

The annual Day-Night Noise Level (DNL) noise contours depicted in the DEIS are misleading and fallacious for two reasons: (1) inappropriate use of 365-day averaging rather busy-day averaging, and (2) holding up as scientifically valid an outdated, misleading, and scientifically invalidated DNL threshold for high noise annoyance

Olga, WA 98279

- 1.a. Thank You
- 4.f. Noise Measurements/Modeling/On-Site Validation
- 4.j. Other Reports

The DEIS claim that the JGL noise study was “flawed” is disingenuous and unsupportable, whereas in actuality the Wyle modeled noise levels have not been validated with on-site noise data. The DEIS misconstrued important finding of the National Park Service’s 2015 noise study at Ebey’s Landing Historic National Reserve and obfuscated forthright analysis of the impacts on visitor experience. That misconception has to be credibly revised to properly characterize the real impacts.

Olga, WA 98279

1.a. Thank You  
4.q. Potential Hearing Loss

Even on outer islands in the San Juans, the noise levels are physically abusive. The Navy has adopted standards that protect their personnel from health and hearing harm due to excessive noise, yet these standards were ignored by the DEIS for civilians exposed to the same or greater levels of noise. This DEIS needs to examine how many civilians would receive exposure doses that exceed the Navy's defined "hazardous noise zone" threshold (i.e., an area where the 8-hour time-weighted average exceeds 84 dBA [or 140 dB peak sound pressure level, SPL, for impact or impulse noise] for more than 2 days in any month).

Olga, WA 98279

1.a. Thank You

11.d. Per- and Polyfluoroalkyl Substances

Perfluoroalkyl substances (PFAS) have been discovered in numerous wells adjacent to OLFC and are believed attributable to fire-retardant foam use at OLFC. The DEIS, however, dismissed addressing the related past, present, and future impacts and problems associated with PFAS, even though the EPA has set a Health Advisory that has been exceeded by 16-fold in some of the impacted wells. Leakage of PFAS in storage or their use in a crash event is a hugely relevant environmental impact that must be addressed.

Olga, WA 98279

The DEIS noise levels were based on about 30% of the proposed 8800 to 35,000+ operations at OLFC being conducted on Path 14. Since 2013, when the transition to Growlers was relatively complete, the highest use of Path 14 has been about 2 to 10% because, as base commander Captain Nortier explained Growlers are only rarely capable of using Path 14. The DEIS 30% use projection of path 14 greatly understates the DNL noise impacts for path 32 and overstates the impacts on Path 14. This mistake must be corrected.

1.a. Thank You

3.e. Field Carrier Landing Practice Patterns

3.f. Field Carrier Landing Practice Operation Totals

3.g. Field Carrier Landing Practice Evolutions and High Tempo



Olga, WA 98279

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states, "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and reanalyzed. The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

- 1.a. Thank You
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

Olga, WA 98279

The DEIS obfuscates the effects of FCLP jet noise on classroom interruptions by averaging interruptions with periods when jets are not practicing. The average understates interruption events compared with event frequency during FCLP sessions, which are as frequent as an interruption every 1-2 minutes. Interruptions of such frequency complicate teaching and thwart student concentration and break the focus of teacher and student. In addition the EPA states, "Noise can pose a serious threat to a child's physical and psychological health, including learning and behavior," but the DEIS has not recognized the contemporary research. These oversights and failings must be properly addressed and reanalyzed. The DEIS fails to address the effects of noise on hearing and tinnitus and consequential medical costs associated with hearing loss by stating that civilians would need to be exposed to noise emitted by the Growlers for 40 years before there is a permanent shift in hearing. This defies all scientific and audiological evidence to the contrary, even by the US military itself. Hearing loss and tinnitus are the MOST compensated injuries in the military and increasing annually (US Dept. of Veteran Affairs.) That and failure to address the effects of impact or sudden noise must be more fully delineated.

- 1.a. Thank You
- 4.o. Classroom Learning Interference
- 4.q. Potential Hearing Loss
- 4.r. Nonauditory Health Effects

1.a. Thank You

Seattle, WA 98199

I am opposed to the addition of more EA-18G Growlers to the NAS Whidbey Complex. Such an addition will create more noise in an environment that already has enough. Just go to the La Conner area and listen to the Navy jets practicing landings and take-offs, and see how annoying that can be with only a few jets.

Bremerton, WA 98310

1.a. Thank You

12.h. Tourism

7.i. Deception Pass State Park and Other State Parks

February 24, 2017 Re: Comments on Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station (NAS) Whidbey Island To Whom it May Concern: I did not find any evidence of consideration in the Environmental Impact Statement (EIS) related to effects of increased flights and noise on the local tourism economy. As a long-time resident of the Puget Sound area, I have periodically visited the Whidbey Island area as a local tourist, in the past staying at the Deception Pass State Park and Camano Island State Park. And of course, the San Juan Islands are incredibly valued by international, national, and local (in state) tourists. The impacts of noise disturbance on visitor experiences, use, and repeated use of recreational areas is not well studied, but the research that exists suggests that frequent noise disturbance is a detriment to visitors' experience (Miller 1999; Cart 2014; Bernton 2016) and even how they visually perceive and value the landscape (Britton L. Mace, Paul A. Bell, Ross 1999; Reid and Olson 2013). For example, intermittent helicopter noise at 50 dBA – far below the 65 dBA level used in the EIS - was considered “annoying” by 80% of those visiting several National Parks (Miller 1999). Given the low amount of research on noise and tourism impacts generally, not surprisingly there is less on how noise disturbance impacts decisions by tourists to revisit or make travel plans in the first place. However, anecdotally at least, Deception Pass State Park reports substantial losses in income (ie, up to \$500/night) due to refund requests from upset campers (Bernton 2016); common sense suggests that unhappy visitors are unlikely to plan return trips. Given the increasing reliance on use of online reviews (e.g., TripAdvisor.com, Yelp.com) for planning vacations and places to stay, many visitors may opt for different travel plans entirely vs. risking a visit to the area. The 65 dBA day-night average level used as a common metric in the EIS is approximately equivalent to noise experienced during the day at urban areas next to Interstate 5 and underneath SeaTac Airport (Kuehne et al. 2013), which represents a substantial level of disturbance and one that is not conducive to the experience that many tourists seek when traveling to this region. As such, it seems clear that increased air traffic at the levels proposed in the EIS have the capacity to substantially reduce the number of tourists to the area for many decades into the future; even if the flights were to decrease at some point, the damage to the tourist economy would already be done. The EIS does not acknowledge impacts to the economy due to losses in tourism. As an example of the importance of this industry to the region, tourism was valued at \$203 million in 2015 in San Juan County alone ([https://www.visitsanjuans.com/sites/default/files/media/2016\\_sjivb\\_annual\\_destination\\_marketing\\_report.pdf](https://www.visitsanjuans.com/sites/default/files/media/2016_sjivb_annual_destination_marketing_report.pdf)). Given the importance of tourism to the local economies of Whidbey, Camano, and the San Juan Islands (not to mention the Olympic Peninsula), the proposed alternatives in the EIS could have substantial economic impacts in the region. These potential disruptions and economic impacts should be considered and well acknowledged in the environmental impacts and consideration of alternatives. Sincerely, [REDACTED] Research Scientist University of Washington References Bernton H. 2016. Jets, helicopters, rockets: Military plans more uses of Northwest public lands. Seattle Times. Britton L. Mace, Paul A. Bell, Ross. 1999. Aesthetic, Affective, and Cognitive Effects of Noise on Natural Landscape Assessment. Soc Nat Resour 12: 225–42. Cart J. 2014. Survey says: Visitors to national parks don't like noise. LA Times.

Kuehne LM, Padgham BL, and Olden JD. 2013. The soundscapes of lakes across an urbanization gradient (ZD Deng, Ed). PLoS ONE 8: e55661. Miller NP. 1999. The effects of aircraft overflights on visitors to US National Parks. Noise Control Eng J 47: 112–117. Reid PP and Olson S. 2013. Protecting national park soundscapes. Washington, D.C: National Academies Press.

Bremerton, WA 98310

1.a. Thank You

12.h. Tourism

7.i. Deception Pass State Park and Other State Parks

February 24, 2017 Re: Comments on Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at Naval Air Station (NAS) Whidbey Island To Whom it May Concern: I did not find any evidence of consideration in the Environmental Impact Statement (EIS) for the impacts of increased flights and noise on the local tourism economy. As a long-time resident of the Puget Sound area, I have periodically visited the Whidbey Island area as a local tourist, in the past staying at the Deception Pass State Park and Camano Island State Park. And of course, the San Juan Islands are incredibly valued by international, national, and local (in state) tourists. The impacts of noise disturbance on visitor experiences, use, and repeated use of recreational areas is not well studied, but the research that exists suggests that frequent noise disturbance is a detriment to visitors' experience (Miller 1999; Cart 2014; Bernton 2016) and even how they visually perceive and value the landscape (Britton L. Mace, Paul A. Bell, Ross 1999; Reid and Olson 2013). For example, intermittent helicopter noise at 50 dBA – far below the 65 dBA level used in the EIS - was considered “annoying” by 80% of those visiting several National Parks (Miller 1999). Given the low amount of research on noise and tourism impacts generally, not surprisingly there is less on how noise disturbance impacts decisions by tourists to revisit or make travel plans in the first place. However, anecdotally at least, Deception Pass State Park reports substantial losses in income (ie, up to \$500/night) due to refund requests from upset campers (Bernton 2016); common sense suggests that unhappy visitors are unlikely to plan return trips. Given the increasing reliance on use of online reviews (e.g., TripAdvisor.com, Yelp.com) for planning vacations and places to stay, many visitors may opt for different travel plans entirely vs. risking a visit to the area. The 65 dBA day-night average level used as a common metric in the EIS is approximately equivalent to noise experienced during the day at urban areas next to Interstate 5 and underneath SeaTac Airport (Kuehne et al. 2013), which represents a substantial level of disturbance and one that is not conducive to the experience that many tourists seek when traveling to this region. As such, it seems clear that increased air traffic at the levels proposed in the EIS have the capacity to substantially reduce the number of tourists to the area for many decades into the future; even if the flights were to decrease at some point, the damage to the tourist economy would already be done. The EIS does not acknowledge impacts to the economy due to losses in tourism. As an example of the importance of this industry to the region, tourism was valued at \$203 million in 2015 in San Juan County alone ([https://www.visitsanjuans.com/sites/default/files/media/2016\\_sjivb\\_annual\\_destination\\_marketing\\_report.pdf](https://www.visitsanjuans.com/sites/default/files/media/2016_sjivb_annual_destination_marketing_report.pdf)). Given the importance of tourism to the local economies of Whidbey, Camano, and the San Juan Islands (not to mention the Olympic Peninsula), the proposed alternatives in the EIS could have substantial economic impacts in the region. These potential disruptions and economic impacts should be considered and well acknowledged in the environmental impacts and consideration of alternatives. Sincerely, [REDACTED] Research Scientist University of Washington References Bernton H. 2016. Jets, helicopters, rockets: Military plans more uses of Northwest public lands. Seattle Times. Britton L. Mace, Paul A. Bell, Ross. 1999. Aesthetic, Affective, and Cognitive Effects of Noise on Natural Landscape Assessment. Soc Nat Resour 12: 225–42. Cart J. 2014. Survey says: Visitors to national parks don't like noise. LA Times.

Kuehne LM, Padgham BL, and Olden JD. 2013. The soundscapes of lakes across an urbanization gradient (ZD Deng, Ed). PLoS ONE 8: e55661. Miller NP. 1999. The effects of aircraft overflights on visitors to US National Parks. Noise Control Eng J 47: 112–117. Reid PP and Olson S. 2013. Protecting national park soundscapes. Washington, D.C: National Academies Press.

Lopez Island, WA 98261

The Growler noise is an affront to the beauty of the San Juan Islands. We have yet to see real assessments of the noise. How does it affect human health? How does this noise affect the Orca pods of whales? Is the drinking water monitored for safety concerns?

- 1.a. Thank You
- 10.m. Impacts to Marine Species and Habitat
- 11.d. Per- and Polyfluoroalkyl Substances
- 4.r. Nonauditory Health Effects
- 4.v. Impacts to Domestic Pets, Livestock, or Wildlife



Sedro Woolley, WA 98284

Well folks, this is my last supplemental comment. I refer you back to my comment letter of 7 Dec. 2016. All my comments via webform were intended to be supplemental to that letter - and sometimes in direct response to the opposition bench. I've read the Ebey's NHR pompous self-important letter. I've read a more moderated Town of Coupeville letter in a tone I appreciate. Both of which request Scenario C for OLF, ignoring that OLF has insufficient # of bounces for the jets at NAS Whidbey Island now. I've also read of the whining of some Central Whidbey folks about talk of economic sanctions and the withholding of a grant in part due to some very destructive rhetoric. Well, I do "get it" as a former sole proprietor how small profit margins are for small businesses but this has been a 4.5 year community disruption. That said, I would like all these folks opposing Scenario A for OLF to think of the military families and friends of NAS Whidbey Island personnel and what is actually heard. I wish the Ebey's NHR Trust Board with their rhetoric of "detachment training" and I had a few words about how hurtful that is the idea I could never get my special friend who gave me patches flying to thank me for sticking up for OLF which is making me poo blood due to high stress as I write on 23 Feb 2017. I would like the Coupeville Mayor to drive up and have a talk with a VAQ-129 instructor family about how inadequate the current situation is and how comments requesting the fewest # of bounces keep that family away from each other. Maybe if these leaders of Central Whidbey stood up to COER instead of giving individual COER members a special relationship with Ebey's NHR and special Town Council time to COER to present I wouldn't be writing in this tone and so reluctant to financially support their community. Maybe if these leaders of Central Whidbey would take without whining the repercussions for the past 4.5 years and their stance I would be more gracious. Let me add as well that being a fan of petitions, a clearly protected First Amendment right, <https://www.ipetitions.com/petition/isupportnaswi> has as of 2231 Hours Pacific 23 Feb. 2017 1,565 signatures stating, "On behalf of the City of Oak Harbor, Oak Harbor Chamber of Commerce, Navy League, and Island County community members, we resoundingly place our name on this petition in support of NAS Whidbey Island and the United States Navy to maintain, train, and equip combat-ready Naval forces capable of winning wars, deterring aggression and maintaining freedom." Tells me where the local community truly stands. I also hope there is a sincere effort to rename and rededicate OLF Coupeville. Get the call letters to something other than NRA and get that ungrateful town off of "MY" runway!!! As much as I acknowledge that most naval aviators would like to consider landing on an aircraft carrier an "administrative task"; let us make OLF a place of PRIDE and joy. Furthermore, my patriotism is not bound by political party or by the sound of a combat aircraft. My patriotism is to a nation created out of a dream on 4 July 1776 that, "We hold these truths to be self-evident, that all men are created equal, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty and the Pursuit of Happiness." A constitutional republic that makes clear under Article I, Section 8, "The Congress shall have power" "To provide and maintain a Navy; To make Rules for the Government and Regulation of the land and naval Forces." Congress is where the anti-OLF forces should go - and when I point this out, the enemy smirks and fumes online knowing they will lose. I mean outside of the relatively small number of aviation geeks in America that are spread out, who is going to want to spend

- 1.a. Thank You
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
- 2.m. Record of Decision/Preferred Alternative

how much fighting for a new outlying field with a new EIS process, the eminent domain, the litigation, the APZs, the works? That's why Congress and the Navy Department should remain resolute in telling those who want a new OLF no. To me after the past month it seems to me you have to choose between being be a citizen of AMERICA or a Citizen of Ebey's Reserve. I choose AMERICA and I think in the final analysis most of Coupeville will - once they demand better leadership. So my fellow Americans, I want to conclude with a very firm request that we see this through to a logical conclusion. Scenario A for OLF (80-20 split between OLF & Ault Field) provides the flexibility the troops I talk to want and when you are falling 700 feet per minute at 150 miles an hour to catch one of four wires in a very tight spot – sometimes at night, safety and ample training should take priority. Lots of afterburner. Remember the men and women who fought hard to stop COER for America. Rename OLF and slap APZs around OLF and commemorate the sacrifices made to keep OLF in American hands to restore honor. Let's bring back to OLF the days when Growlers from all VAQ carrier-borne squadrons – not just the vital Fleet Replacement Squadron – could come and bounce in afterburner please as you, US Navy, are not the problem.

Sedro Woolley, WA 98284

- 1.a. Thank You
- 5.a. Accident Potential Zones

Supplemental comment from monitoring the message boards & social media... uh folks you might want to lay out the differences and similarities between current Ebey's NHR zoning and Accident Potential Zone zoning. I think that would calm some of the Central Whidbey folks. Just very sincerely want to be helpful.

Sedro Woolley, WA 98284

When you figure out how many bounces, make damn sure the allotments are out there for the VAQ-129 fleet replacement squadron and the operational squadrons. It's important to me the true need for VAQ-129 bounces be out there - a special friend of mine is a grad of VAQ-129 and was sent to NAF EI Centro to do FCLP. Sad and hurtful to me - and to the pilot too. Let's go for Scenario A OK please?

- 1.a. Thank You
- 2.m. Record of Decision/Preferred Alternative
- 3.d. Arrivals and Departures

Sedro Woolley, WA 98284

- 1.a. Thank You
- 5.a. Accident Potential Zones
- 5.c. Condition of Outlying Landing Field Coupeville

A couple of supplemental comments today (8 Feb 2017): 1) I am hearing the OLF is operating under a waiver. If so, why not extend OLF's runway and also make sure there's ample public access to watch the flight ops? 2) I also ask APZs be accurately finalized, along with a request for federal funding to move properties as possible. We need APZs and to put a stop to any further encroachment on OLF, period. Thanks: [REDACTED]

Sedro-Woolley, WA 98284

Well folks, this is my last supplemental comment. I refer you back to my comment letter of 7 Dec. 2016. All my comments via webform were intended to be supplemental to that letter - and sometimes in direct response to the opposition bench. I've read the Ebey's NHR pompous self-important letter. I've read a more moderated Town of Coupeville letter in a tone I appreciate. Both of which request Scenario C for OLF, ignoring that OLF has insufficient # of bounces for the jets at NAS Whidbey Island now. I've also read of the whining of some Central Whidbey folks about talk of economic sanctions and the withholding of a grant in part due to some very destructive rhetoric. Well, I do "get it" as a former sole proprietor how small profit margins are for small businesses but this has been a 4.5 year community disruption. That said, I would like all these folks opposing Scenario A for OLF to think of the military families and friends of NAS Whidbey Island personnel and what is actually heard. I wish the Ebey's NHR Trust Board with their rhetoric of "detachment training" and I had a few words about how hurtful that is the idea I could never get my special friend who gave me patches flying to thank me for sticking up for OLF which is making me poo blood due to high stress as I write on 23 Feb 2017. I would like the Coupeville Mayor to drive up and have a talk with a VAQ-129 instructor family about how inadequate the current situation is and how comments requesting the fewest # of bounces keep that family away from each other. Maybe if these leaders of Central Whidbey stood up to COER instead of giving individual COER members a special relationship with Ebey's NHR and special Town Council time to COER to present I wouldn't be writing in this tone and so reluctant to financially support their community. Maybe if these leaders of Central Whidbey would take without whining the repercussions for the past 4.5 years and their stance I would be more gracious. Let me add as well that being a fan of petitions, a clearly protected First Amendment right, <https://www.ipetitions.com/petition/isupportnaswi> has as of 2231 Hours Pacific 23 Feb. 2017 1,565 signatures stating, "On behalf of the City of Oak Harbor, Oak Harbor Chamber of Commerce, Navy League, and Island County community members, we resoundingly place our name on this petition in support of NAS Whidbey Island and the United States Navy to maintain, train, and equip combat-ready Naval forces capable of winning wars, deterring aggression and maintaining freedom." Tells me where the local community truly stands. I also hope there is a sincere effort to rename and rededicate OLF Coupeville. Get the call letters to something other than NRA and get that ungrateful town off of "MY" runway!!! As much as I acknowledge that most naval aviators would like to consider landing on an aircraft carrier an "administrative task"; let us make OLF a place of PRIDE and joy. Furthermore, my patriotism is not bound by political party or by the sound of a combat aircraft. My patriotism is to a nation created out of a dream on 4 July 1776 that, "We hold these truths to be self-evident, that all men are created equal, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty and the Pursuit of Happiness." A constitutional republic that makes clear under Article I, Section 8, "The Congress shall have power" "To provide and maintain a Navy; To make Rules for the Government and Regulation of the land and naval Forces." Congress is where the anti-OLF forces should go - and when I point this out, the enemy smirks and fumes online knowing they will lose. I mean outside of the relatively small number of aviation geeks in America that are spread out, who is going to want to spend

- 1.a. Thank You
- 2.c. Compliance with the National Environmental Policy Act
- 2.e. Public Involvement Process
- 2.k. Range of Alternatives
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how much fighting for a new outlying field with a new EIS process, the eminent domain, the litigation, the APZs, the works? That's why Congress and the Navy Department should remain resolute in telling those who want a new OLF no. To me after the past month it seems to me you have to choose between being be a citizen of AMERICA or a Citizen of Ebey's Reserve. I choose AMERICA and I think in the final analysis most of Coupeville will - once they demand better leadership. So my fellow Americans, I want to conclude with a very firm request that we see this through to a logical conclusion. Scenario A for OLF (80-20 split between OLF & Ault Field) provides the flexibility the troops I talk to want and when you are falling 700 feet per minute at 150 miles an hour to catch one of four wires in a very tight spot – sometimes at night, safety and ample training should take priority. Lots of afterburner. Remember the men and women who fought hard to stop COER for America. Rename OLF and slap APZs around OLF and commemorate the sacrifices made to keep OLF in American hands to restore honor. Let's bring back to OLF the days when Growlers from all VAQ carrier-borne squadrons – not just the vital Fleet Replacement Squadron – could come and bounce in afterburner please as you, US Navy, are not the problem.

# Response to Draft EIS for EA-18G "Growler" Airfield Operations at NAS Whidbey Island



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## DEDICATION

This sortie is for Lt. Cmdr. Nate Barton, USN and his family. Everything to get NAS Whidbey Island's first Blue Angel jet pilot home to his bride and kids. It's why I'm calling this OPERATION NATE STORM. The "Nate" is for him, who also was a Landing Signal Officer at OLF. The "Storm" is well, it's been confrontational with these COERs and it will be so again.

I want my fellow OLFers and I who got hooked on naval aviation watching the Blue Angels to *give back* to Naval Aviation. American citizens like I get to have freedom and awesome parents because the Armed Forces got our backs – and I can't think of a higher honor as an American than to get the backs of our Navy.

I add the penultimate honor I have as an American is being a "Fat Albert" passenger. 31 July 2015. This mission is also for getting to pull at least 2 if not 3 positive G and at least a bit of terrifying negative G over Seattle & Lake Washington with my pilot [REDACTED], my copilot [REDACTED] and observer [REDACTED]. I carry my Bert Coin in my wallet at all times, ready to yank out as appropriate and necessary – like, I don't know, when I'm downrange in The Belly of The Beast called the Island County Commissioners' Chamber and the COER are all around. Never lost a community confrontation and kept my honor clean with that coin in my hand – especially when I had to "fly" four sorties downrange to the Island County Board of Health to hold the line against COER. Long deployments of at least three hours ingress and three-four hours out on public transportation; but at least the COER got no traction. I just hope my Bert Crew is proud of their Bert Passenger – those sorties *and especially this one* is for them and what the Fat Albert program stands for: Spread the troops word and support our frontline troops.



Figure 1: Joe A. Kunzler Fat Albert Coin



Figure 2: My photo from my Whidbey Daily assignment aboard "Fat Albert"

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## INTRODUCTORY THOUGHTS

I want to begin by stating I believe this Draft EIS comment period may just be the last realistic public comment on OLF for the next 20-30 years. Or possibly more, until the EA-18G Growler replacement matures. As such, writing this response is a serious and through undertaking on my part to conclude several years of defending OLF Coupeville, up to and requesting an EIS in a petition I initiated whose cover sheet is Appendix A. Please understand that I understand you, the United States Navy, are required by law to respond to each and every comment to this Draft EIS. I know my friends in America's VAQ Wing are counting on ME to clear the road to keep OLF open and expand its use to an appropriate level. To that end, regardless of how many Growlers you get in the end from Congress, I endorse Scenario A – maximize OLF use.



Figure 3: Joe A. Kunzler Photo of OLF Flight Ops

You may have noticed I use the term OLF – as OLF is short for Outlying Field. A section of my comments will address why I believe OLF needs a name change. I have arrived at the view that the Town of Coupeville may just welcome a name change request and obviously I'm of the view OLF needs to be vigorously defended – up to and including some new branding.

If this EIS process is going to be the last word and there is no successful appeal, then you have a moral obligation to err on the side of "ideal training" over "noise impacts" to a smaller community that *consciously* choose to encroach on OLF in the name of using OLF as OLF, "more closely replicates the pattern and conditions at sea and therefore provides superior training" (Page ES-3). I'm not denying noise impacts at OLF, and clearly the National Park Service is to be commended for doing an actual noise study in Ebey's NHR – doing the work the Navy was requested to do and – albeit very politely – refused the community request.

## WHY OLF?

### Thank You for Responding to Petition to Explain Why OLF

I am very happy with pages 2-18 & 2-19 under "Regional civilian airfields" and "Construct a new OLF" that you resolved why replacing OLF... won't fly and before that pages 2-15 to 2-17 why the Growlers get to stay at NAS Whidbey Island. I want to mention again Appendix A which is the cover sheet to a petition with 1,626 signatures that required an Environmental Impact Statement (EIS) that requested, "Why America's OLF is so vital to the national defense" and, "What exactly an alternative OLF would cost at say preferably Skagit Regional Airport (KBVS), or possibly Quillayute Airport (KUUL), the Yakima Firing Range, or Hanford Nuclear Reservation versus eminent domain around OLF Coupeville (KNRA)."

Considering the 2013 COER petition never mentioned an Environmental Impact Statement at <http://petitions.moveon.org/sign/citizens-group-to-take> filled with spam signatures and considering the COER 2013 litigation complaint only requested, "the required environmental review of its flight operations at OLF," without any parameters I think it's safe to say you are responding to the petition I quarterbacked and exposing some ground truths. You see, the folks that support our troops also wanted resolved for the public record these

<sup>0</sup> One can read the Ebey's NHR study at <https://goo.gl/sGOkG7>.

issues of community concern. You resolved those issues, especially very clearly in Appendix H. We asked, you listened, you pithily responded in depth, I thank you.

### As Captain Moore, USN Explains...

In a recent public records request of Island County Health Department, this 14 July 2016 e-mail from NAS Whidbey Island CO Captain Geoffrey Moore, USN to Island County Commissioner Helen Price-Johnson I think said the best why OLF Coupeville as per Appendix B:

The crews cover altitude adherence in every brief before every OLF Coupeville flight--not only because of the requirement to adhere to our air operations manual, but because it is important to be on altitude and airspeed when a pilot commences their 180 degree descending profile to landing. Any failure to be on altitude--high or low--will most often result in a poor landing pass. I liken it to a boat's approach to a pier--if you start your transition with too much speed, the work load is significantly higher as you have to decelerate more than normal, therefore increasing the odds of overrunning the pier or hitting it with higher than desirable speed.

It's the same thing in the aircraft, only with speed, altitude, and maintaining an optimal abeam distance from the runway. As we develop muscle memory for the approach, it is a disadvantage to be high or low, fast or slow from the ideal starting point when one commences their landing approach; in this situation the pilot will have to work harder to get the aircraft back on parameters as they make the approach which will more likely than not result in a less than optimal landing or waveoff. Another way to look at it--not being on altitude or airspeed or at proper distance from the runway is like a professional batter not being ready to swing when the pitcher commences their windup--they will most likely never catch up.



Figure 4: 6 January 2014 FCLP at OLF

Failure to hit their parameters when flying our Field Carrier Landing Practice approaches at Ault Field or OLF Coupeville will only be more pronounced when a pilot makes their approach to the moving flight deck on the carrier--this is why our Landing Signal Officers constantly emphasize this as they review each pass

I republish this e-mail as a) I think it should be damn clear the *raison d'être* of OLF and b) To make damn sure this e-mail is in the official record just-in-case COER appeals.

### Quoting Declarations Received to Stop Injunction Attempt

Considering that Captain Moore's naval aviation experience has been with helicopter squadrons, I wanted to slide in Captain Benjamin Hewlett, USN's declaration into this testimony (See Appendix C) to rebut a 2015 attempt to close OLF Coupeville via an injunction:

I was designated a Naval Aviator following completion of advanced aviator training in January 1995. Over the past 20 years, I have served as an operational aviator and a flight instructor, including duty as a Carrier Air Wing Landing Signals Officer, where I was responsible for the safe and expeditious recovery of all aircraft aboard the aircraft carrier. ... I have personally flown the EA-18G "Growler" on numerous occasions, and I have flown out of NAS Whidbey Island and practiced FCLPs at Outlying Landing Field ("OLF") 10 Coupeville. I have 760 carrier-arrested landings. ... The dynamic and high risk nature of night carrier operations requires very strict night Field Carrier Landing Practice (FCLP) periodicities for aircrew proficiency prior to embarking the ship for any at sea period in order to ensure the an acceptable level of risk is maintained. Carrier landings are a perishable skill, and Navy policy mandates that FCLP training should be conducted within five days of landing on the aircraft carrier and must in no case be conducted more than 10 days prior to landing on the carrier. Having conducted FCLPs at OLF Coupeville, I believe OLF Coupeville provides a realistic environment in which to practice FCLPs. Any degradation of the ability for VAQ-137 to conduct FCLPs in an environment as ideal as OLF Coupeville prior to embarking aboard ship will degrade U.S. and coalition combat effectiveness while creating unacceptable risks for the aviators and crewmembers aboard TR [TR = USS *Theodore Roosevelt*].



Figure 5: VAQ-137 Rooks Using OLF in 9/2014

Let me also quote the immediate former CO of NAS Whidbey Island Captain Mike Nortier, USN as well who wrote the judiciary and whose declaration is Appendix D:

I was in command of NAS Whidbey Island on June 28, 2013 when U.S. Fleet Forces halted flight operations at OLF Coupeville, and when FCLPs at OLF Coupeville resumed in January 2014. Ault Field was utilized to meet most of the remaining FCLP training requirements for that year. The suspension of flight operations at OLF Coupeville created operational impacts that were not sustainable, either as a permanent solution or as a temporary solution extending much longer than what was experienced in 2013.

...

During November of 2013, as several squadrons conducted FCLPs in preparation for deploying on aircraft carriers, other aircraft awaiting departures and arrivals encountered extensive delays, in some cases greater than 45 minutes. The back-up of aircraft waiting to take off or land accumulates when closed-pattern FCLPs are conducted at Ault Field. Because FCLPs are so closely sequenced, non-FCLP aircraft must hold on the taxiway to await a gap in flying to safely depart. Backups on the airport taxiways due to FCLPs lead to missed training windows in military operations areas (MOAs) and military training routes (MTRs), which are tightly scheduled to meet the requirements of 20 squadrons assigned to NAS Whidbey Island. In order to relieve the congestion on the ground in 2013, the air traffic controllers had to create space between airborne FCLP aircraft-to create an opening in what is normally a closed pattern-so that other aircraft could take off or land. This lengthened the FCLP pattern so that aircraft flew outside the standard FCLP patterns. This has a detrimental impact on FCLP training, because the pattern being flown no longer closely resembles the pattern flown at sea. It also means that FCLP aircraft fly over different locations in the community than under a standard pattern, which tends to give rise to additional noise complaints.

I know Captain Nortier personally and I know Captain Nortier is a man of professional honor. If Captain Nortier claimed, "operational impacts that were not sustainable" then much deference should be given to the warfighters defending these United States of America.

## OLF IS NOT NEW, NOR ARE NOISE COMPLAINTS

In the past year, as able, yours truly has been browsing the Whidbey News-Times on the Oak Harbor Library microfiche archives. I register disappointment at the lack of historical documentation and discussion about OLF in your report. Being you will receive quite a few pro-OLF comments and this response is heavily biased as being from a self-identified afterburner extremist, I'm going to select a small handful of newspaper articles.

### 1967 Reactivation of OLF

For instance, in 1967 alone, the 26 January 1967 Whidbey News-Times reported OLF on 5 January 1967 had three Grumman A-6A Intruders show up and bounce, initiating jet usage of the OLF (See Appendix E-1). The 3 August 1967 Whidbey News-Times (See Appendix) went on to report full training ops would begin in September and then laid out the operations of OLF in 1967 which appear to mirror the case today (See Appendix E-2). However, the 21 September 1967 Whidbey News-Times in an article titled, "Coupeville Flights Curtailed", "Flight operations until early morning hours by Whidbey Island Naval Air Station jets at the Coupeville field produced some unhappy people in the Coupeville area this past week. ... The Coupeville field was recently reactivated to handle increased training requirements for the A6A medium jet attack squadrons and the A3B heavy jet attack-aerial refueler squadrons" (See Appendix E-3).

### 1987 Rise of WISE

In 1987, a group called Whidbey Islanders for a Sound Environment or WISE formed. According to the 4 November 1987 Whidbey News-Times (See Appendix E-4), Ken Pickard (now of COER) was an attorney. The group wanted to enter into a dialogue with the Navy while also considering litigation and pressure upon politicians. In a 9 May 1992 Whidbey News-Times article titled, "County supporting Navy during '87 controversy" and as Appendix E-5 reminiscing about 1987, the article mentions pressure applied upon the Island County Commissioners and, "**WISE attorney Ken Pickard** later said his group was contemplating a conflict-of-interest lawsuit against Koetje because he owns land in the disputed zones. No action was ever filed."

### 1991 BRAC Attempt

In the heady days of the spring of 1991, Whidbey Islanders for a Sound Environment or WISE even went so far as to testify to the Base Closure and Realignment Commission (BRAC) that according to the 8 May 1991 Whidbey News-Times, about the "WISE membership vote in favor of the Navy's decision to close NAS Whidbey." Like a certain COER now, WISE claimed, "We are not against the Navy. We are for solving some problems." (See Appendix E-6). Now you know why local supporters of NAS Whidbey Island get real cynical when we hear from noise complainers like COER, "We are not against the Navy".

## DAYS OF OLF USE?

*Moving along*, I noticed that your displays at the Draft EIS Public Meetings make a reference to # of days OLF is being used currently, but you do not have in the Draft EIS how many days each scenario will be using OLF. Below is a crop on the display "Airfield Operations":



Figure 6: Airfield Operations Graphic at EA-18G Draft EIS Open Houses

It would be interesting what the pie charts would be under Scenarios A, B & C. Also helpful to show, "OK Scenario A entails this many OLF days versus 'no action' just so you know".

### THANKS FOR NOT SPLITTING THE VAQ WING UP

I agree with your comments from pages 2-13 to 2-19. I think the costs of doing what COER and other such noise agitation groups want (e.g. build OLF replacement, split up the VAQ Wing) far outweigh the costs of any successful future inverse condemnation or eminent domain suit noise agitation groups may bring against the US Government.

As to your specific comments on page 2-18 regarding "Detachment training out of the region", I got to cover for AIR International the homecoming of the VAQ-139 Cougars in the spring of 2015. One of the aircrew, who shall remain anonymous as he wasn't being interviewed to respond to your Draft EIS, told me straight up having to go to NAF El Centro would mean 2-3 weeks away from family before a historic 10 month deployment.

I'm happy the US Navy Department is seeking to prioritize military families over jerks who consciously choose to live next to a Naval Outlying Field and then complain about the noise. Oh and then claim health hazard but never request eminent domain or inverse condemnation.

### A Note From the Scoping Period

I noted back on 10 October 2014 when you issued in the National Register a, "Revised Notice of Intent To Prepare an Environmental Impact Statement for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island, WA and Notice of Request for Public Scoping Comments" at <https://goo.gl/oC1Agi>, you said very publicly in part, "The DoN is not considering alternative locations for FCLP training, or squadron relocation." If Citizens of the Ebey's Reserve (COER) had a problem with this, well then you have to ask yourself why did COER not appeal demanding a course correction?

It's blatantly obvious to me COER has questionable standing at best to impugn this EIS as a result. Especially as the group that initiated this EIS process in its litigatory complaint requested only, "The required environmental review of its flight operations at OLF" with no specific legal request to seek alternatives to OLF. I am

mentioning this so that if there is judicial review of this EIS, then the documentation is presented into the record for a rapid rebuttal.

### **PLEASE USE THE AFTERBURNERS AT OLF EVERY BOUNCE!**

It smacks of coddling COER or of children with training wheels flying the EA-18G Growler when the Growlers do not use the afterburners at OLF Coupeville. Using afterburners at OLF gets the OLFers doing dances. *You mind* using the afterburners more often like below please:



Figure 7: Vapes and Burner at OLF... Priceless



I mean I'm an afterburner extremist, as I will travel into Abbotsford, Canada and Joint Base Lewis-McChord in the name of getting afterburner in my life from the US Navy Tac Demo. I would appreciate very much the use of afterburner at OLF Coupeville on a regular basis *please*, it's time noise complainers were told to be elsewhere.

Once those afterburners of freedom go off, it's the brightest lights in the sky. Your patriotic pride soars. You know the people whining and requesting "noise abatement" will never, ever support the Navy. Instead you get a full airshow in *your* community.

Speaking of airshows and the community, you mind please having the US Navy Tac Demo come up to NAS Whidbey Island and perform every single year please? I mean I *am* an afterburner extremist but quite frankly who does not want the thrills of a Super Hornet pulling the vapes out of the sky and lighting the skies with afterburner? Oh people who will never love you, people who hate the military, people who want to sink the Navy. Please *stop* accommodating folks who move next to a Naval Air Station and complain about the noise. Instead you should openly encourage, welcome and reward afterburner extremists!

After all, I really appreciate the 142<sup>nd</sup> Fighter Wing out of Oregon for protecting our local air sovereignty. I also had the honour of touring the Wing last August, but the best part, bar none was the afterburner take-off that put an *afterburner grin* on my face. Especially as I can *choose* to wear hearing protection so when I get home or back to my hotel, I can hear me type and my favourite podcasts.

My point being: Afterburner take-offs make me smile. Please use afterburners. Thanks!

## PUBLIC NOTIFICATION

### Field Carrier Landing Practice (FCLP) Schedules

Let me begin by stating as per page 1-20 of your Draft EIS with my emphasis, "The installation [NAS Whidbey Island] frequently corresponds with numerous media outlets and utilizes its webpage and social media, such as the station's Facebook page, to share flight schedules and other information and to solicit public feedback. Where possible and if weather conditions allow, station officials modify flight operations to minimize noise impacts, such as during weekends and during school exams. ... The installation will continue to publish FCLP schedules and issue notifications for additional activities, such as weekend festivals." I ask you continue to publish the NAS Whidbey Island FCLP schedules please so folks who support OLF can attend and those claiming adverse impacts from OLF can make alternative plans. These FCLP schedules are vey much appreciated.



Figure 8: USN Tac Demo Afterburner... at Abbotsford Airshow, BC, Canada



Figure 9: Oregon ANG F-15C Afterburner Take-Off

Let me add as well that as early as 1968 you were having the Whidbey News-Times publish schedules with the times – not just some “mid afternoon” or “late evening” statement. Here’s from the October 30, 1969 Whidbey News-Times as per Appendix E-7:



Figure 10: FCLP Schedule at OLF in October 30, 1969 Whidbey News-Times

Also, here’s from the 16 December 1987 Whidbey News-Times:

**Navy Field Landing Practice**  
For week of Dec. 16-22

	Wed.	Thurs.	Fri.	Sat.	Sun.	Mon.	Tues.
<b>Ault Field</b>	5-9 p.m.	10 a.m. 1 p.m.	clear	clear	clear	11 a.m. 9 p.m.	11 a.m. 8 p.m.
<b>OLF Coupeville</b>	clear	clear	clear	clear	clear	2:45- 9 p.m.	4:45- 9 p.m.

All times listed in this schedule are subject to change due to weather, operational commitments and/or training requirements. This information is also broadcast daily on radio station KJTT, 1110 AM. For current FCLP schedules, call the NAS Whidbey Weather/FCLP hotline at 257-2675.

Figure 11: December 16-22, 1987 FCLP Schedule

I also think it would build trust if the Navy would also please make public each week how close the Navy is to its annual allowance of using OLF. Somehow on 25 June 2016, USN Captain Geoffrey Moore can e-mail Island County Commissioner Price-Johnson as per Appendix F,

I discussed the downwind altitude with my operations officer after our discussion on Tuesday, and confirmed that the daytime altitude of 800 feet and the nighttime altitude of 1,200 feet has not changed in as far back as they have been stationed at NAS Whidbey Island. These altitudes are the same ones that we fly at the carrier, and with the precision requirements of that difficult task, the best training is achieved when we can duplicate the sight picture of the same altitude as the carrier pattern.

## Response to Draft EIS for EA-18G "Growler" Airfield Operations at NAS Whidbey Island

As of this morning, we have flown 3,906 operations of our NEPA allowance of 6,120 operations. That translates into 56 hours and 7 minutes total flight time at OLF Coupeville since January 1st; 5 hours and 14 minutes of that total has been flown between 10 p.m. and midnight.

I wish this above information was please attached to the weekly FCLP schedules. Thanks.

### Flyovers & Guest Stars

Since this is about EA-18G Airfield Ops, I really think it is germane to bring up VAQ Wing flyovers and "guest stars" that train with the VAQ Wing. I submit it would be in the US Navy's interests to let folks know if/when NAS Whidbey Island is going to do flyovers and other public participation. I, for one, would travel to see a flyover. Also I'd like to request a flyover in afterburner of local airshows and also, obviously the Santa Clara Forty Whiners fan club in Central Whidbey calling themselves COER.

Furthermore, for some folks having a website like the Royal Australian Air Force (RAAF) or Facebook postings by the 142<sup>nd</sup> Fighter Wing out of Oregon notifying folks of increased flight ops helps folks plan their lives. I think NAS Whidbey Island should continue to advise folks of Field Carrier Landing Practice flight ops but also let people know ASAP when there are training exercises the base participates in and also for instance a B-1B Bomber is coming or a F-22 Raptor or the VFC-12 "Fighting Omars" come to town so folks can enjoy a little airshow in their community!

Obviously if um, two certain US Marine Corps Majors and a Captain in their C-130J could please come to Whidbey and reenact being "Fat Albert" pilots, that would be much appreciated. The more guest stars, the merrier. Beat COER! Thanks.



Figure 12: VFC-12 "Fighting Omars" Spotted on 2013 Public Tour of NAS Whidbey

### POTENTIAL OTHER SERVICES' USE OF OLF

I have to inquire that when OLF sits unused by NAS Whidbey Island, why not use the OLF for C-17s out of McChord AFB to practice short-field landings and take-offs? Or Marines come up to practice with C-130Js and V-22s? Or Fort Lewis helicopters to come up to OLF and scrimmage? Or bring some Hornets up from NAS Lemoore for extra Field Carrier Landing Practice? I mean, on the days NAS Whidbey Island isn't using OLF, why let OLF sit idle if the environmental impacts will be less than the EA-18G Growler? Why should the Navy Department let the Marine Corps and the Air Force and yes, the Army not join in the fun in honoring noise requests? I mean there are some who'd pay a PREMIUM to live next to an airport and who would love OLF to never sit fallow!



Figure 13: Yes, C-17s Need Short Fields Too

### SECTION 106 COMMENTS

#### A Few Words About the Section 106 Process

I am publicly registering my fundamentally displeasure where most of the details about process has been found via public disclosure requests and well-timed leaks by government relations special operatives such as I. I am fundamentally disturbed at the thought the Section 106 process Barriergate (informal name for the political fallout from placing eco-blocks around OLF) group tilts so far anti-OLF and pro-OLF voices are excluded.

## Response to Draft EIS for EA-18G "Growler" Airfield Operations at NAS Whidbey Island

Let's not forget: COER has said many times in many online and physical public forums at a minimum fundamental opposition to the EA-18G Growler at NAS Whidbey Island as per Appendix G – but I am responding to the US Navy Department and a US Navy Draft EIS before me so I will ask instead: Where is the consultation with *proponents* for the NAS Whidbey Island?

### Area of Potential Effect (APE)

I ask the US Navy please take this position: The only APE that matters is OLF Coupeville and maybe Ebey's NHR if Ebey's NHR Board makes this a condition of *embracing* OLF. Period.

### Mow the Damn Grass

Sometimes when I show up for a Field Carrier Landing Practice (FCLP), I find the grass has not been mowed. Considering I have pictures of tires smoking and you have jets bouncing around, there is a potential fire hazard. I have no desire to ignore something that could interfere with farming operations at Ebey's NHR. Also as a former farmer until my misaligned spine got worse; I know that weeds allowed to grow on a neighbor's yard can easily spread for square miles. Finally, as somebody who likes to photograph the flight ops the natural vegetation can interfere with photo ops. For all of those reasons, *please* mow the grass at least every two weeks as you would your home lawn.



Figure 14: *Please Mow the Grass Before FCLP*

So what if somebody has to see some concrete blocks entering Ebey's NHR? Big whoop-dee-do. COER and their pals whining about noise disclosure say folks were not aware driving past OLF – so why not make OLF more visible to folks driving by? Why does Navy Region Northwest seem so eager to accommodate the folks who have litigated against NAS Whidbey Island but *not* the supporters of OLF?

### What About Rewarding the OLFers Instead?

I'm going to make the suggestion at the end of the day, instead of trying to appease the unappeasable and angering your friends... I mean... just do anything to change slightlines a little at OLF and COER and their pets in DAHP scream, "ADVERSE IMPACT" and now we get years of process inside a leaky box to appease the unappeasable.

So if we're going to have this nice, tidy arrangement let's just swing the pendulum so far where COER gets the message, "COER, EVEN WHEN YOU'RE SCRIPTED, YOU'RE USELESS!" I would really like to see a conversation about making OLF more aviation photographer friendly. I mean maybe a circumference trail? Maybe push in the lines so folks can get closer as long as we do not interfere with Field Carrier Landing Practice? Maybe an annual photocall at the OLF? Make OLF more publicly visible and there you go. This fan of OLF wants to have a passionate fan base that Navy servicemembers can be proud of OLFers support.

### Honor the Heroes Who Saved OLF

Let me quote former General Stanley McChrystal who said on National Geographic's American War General when he was touring Gettysburg monuments, "They put volunteer because they were proud to have been volunteers. They were communicating they weren't drafted. That they were here by choice. The monuments were put after the fight. And for many years I had a tough time understanding what the monuments were about because I thought they were about guys wanting credit for what they done, put a monument here,

<sup>o</sup> Online being e.g. Facebook, physical public forum being a public meeting of elected officials.

beat their chest and say I'm a hero. That's not what they are. They were trying to simply mark a place where they had served and where they'd made a sacrifice. They wanted some validation that what they had done mattered. Because it doesn't feel good at the time. It's difficult and it's dirty and it's frightening and sometimes you're not quite the soldier you want to be and you're part of things that you'll never think you'll have to be part of. You need some affirmation. It's important 150 years ago and it's important today."

To that end, you folks on the Navy EIS Staff please honor yourselves on the Navy EIS Staff with a plaque or something with your names. You better honor one U.S. Attorney Rachel K. Roberts who stopped the 2015 COER Injunction Attempt – maybe a bench at a OLF viewing site? Please consider honoring the US Navy sailors who have served at OLF as well. As far as me goes, just name a bus stop at OLF That complies with AICUZ the "Joe Kunzler Bus Stop" with a plaque that says, "Yeah you can have autism, you can have a bad back, you can have bad left eye and you can have PTSD... but you can *still* serve and give back to the greatest nation on the planet. America is GREAT because Americans give back and make America GREATER." *Thanks.*

## RENAMING OLF COUPEVILLE (KNRA)

This request may or may not be within scope of the Navy's Environmental Impact Study, but considering the Town Government of Coupeville's *seeming* opposition to this study, considering most of the opposition to Field Carrier Landing Practice at OLF and considering how the call letters of NRA are absolutely political and offensive – I think it's time for a name change.



Figure 15: Coupeville 6/2013 "Zip Code Forum"

- OLF (Michael J.) Smith would be to honor the late A-6 pilot and NASA Shuttle Pilot who perished in the Challenger explosion. Some of Smith's service was at NAS Whidbey Island.
- OLF (William C.) McCool would be to honor a former VAQ-133 Wizards EA-6B Landing Signal Officer who worked at OLF and then served as a test pilot, a department head in VAQ-132 Scorpions, as a test pilot and then in NASA. Sadly perished in the Columbia tragedy.
- OLF (Nate) Barton may be a long shot, but if the first two don't work then I like the idea of naming OLF after the first NAS Whidbey Island Blue Angels pilot. I have to say the 2014 & 2015 Blue Angels seasons were spectacular looking for Blue Angel #3 and Blue Angel #4 respectively.

Also um, considering my mother [REDACTED] was attacked in front of her Autistic Spectrum (Asperger's) son with a gun obtained through a loophole the National Rifle Association or NRA fought to defend for felons... I would really appreciate the call letters be replaced on OLF Coupeville please to KNZR or KNLR. When you do change the call letters, I want my two parents to cut the orange ribbon and when they do, I want it real clear that was for my folks. Not me. Thanks, as I credit my parents with a lot of who and what I am.

## CONCLUDING THOUGHTS

*This is a moment to seize. The Kaleidoscope has been shaken. The pieces are in flux. Soon they will settle again. Before they do, let us re-order this world around us.*

Right Honorable Tony Blair, Former British Prime Minister

Indeed, this *is* a moment to seize. You are seeking a clear mandate to keep OLF safely free from future threat, and I have sought to help you.

It's blatantly obvious the legally allowed time to appeal the 2005 Environmental Assessment (EA) into EA-18G Growler basing at NAS Whidbey Island has passed. As such, all this EIS can do is build upon the EA and make NAS Whidbey Island a better home for the VAQ Wing. Which is the goal of my comments.

That said, I want to be straight-up with all you US Navy folks and I want to explain in my own words why this fire in my belly. Yes, I love afterburners. Yes, I love vapes. Yes, I love "OLF Fridays". Yes, I love EA-18Gs. But you know what I love a lot more? OUR TROOPS. I am ASHAMED I am not in uniform defending this country and our freedoms. As such, the LEAST I can do, the LEAST I can do as an American is stick up for OUR troops and exercise my rights.

I also appreciate and want to commend the EIS Staff on what has been a stressful time. Some of you have given birth to children during this process. Some of you have been treated with absolute disrespect during this process. I appreciate your sacrifices and efforts to make sure America's Navy answered to We The People. So much so as of 3 December as per Appendix H, 500 "Post Clicks" on an ad that simply said, "Support [Naval Outlying Field Coupeville](#)? Then get in a pro-OLF comment to <http://whidbeyeis.com/Comment.aspx> please."

If there was any realistic alternative to using OLF, I would lend support but *your* Appendix H: Civilian Airfield Analysis makes pretty doggone clear there is no alternative to NAS Whidbey's OLF. I also agree wholeheartedly with what is written in pages 1-7 & 1-8. But what is said on page 2-2 is acute and perfect for quoting in a conclusion:

The Navy established requirements for FCLP airfields in order to ensure that FCLP realistically trains Naval aviators to land on an aircraft carrier and used these requirements to inform the development of alternatives. These requirements are crucial because landing on an aircraft carrier is perhaps the most difficult operation in military aviation.

Now let's see this through to a logical conclusion. Scenario A for OLF provides the flexibility the troops I talk to want and when you are falling 700 feet per minute at 159 miles an hour to catch one of four wires in a very tight spot – sometimes at night, safety and ample training should take priority. Lots of afterburner. Remember the men and women who fought hard to stop COER *for America*. Rename OLF. Let's bring back to OLF the days when Growlers from all VAQ carrier-borne squadrons – not just the vital Fleet Replacement Squadron – could come and bounce in afterburner please as you, US Navy, are *not* the problem:



Figure 16: VAQ-139 Cougars Kindly Using Afterburner at OLF

**LIST OF APPENDICES**

- **Appendix A: 2013 Petition Cover Sheet: SAVE OLF COUPEVILLE,**  
<http://www.ipetitions.com/petition/save-olf>
- **Appendix B: 2016-07-14 E-mail From Captain Geoffrey Moore, USN**
- **Appendix C: 2015-05-29 Declaration of Captain Benjamin Hewlett**
- **Appendix D: 2015-05-29 Declaration of Captain Mike Nortier**
- **Appendix E: Selected Newspaper Articles**
  1. 1967-01-26 Whidbey News-Times (WNT): Navy Works on Coupeville Strip
  2. 1967-08-03 WNT: Coupeville Airstrip Readied For Operations
  3. 1967-09-21 WNT: Coupeville Flights Curtailed
  4. 1987-11-04 WNT: Anti-Noise Group Launches Three-Prong Attack
  5. 1992-05-09 WNT: County supporting Navy during '87 controversy
  6. 1991-05-08 WNT: WISE membership vote in favor of the Navy's decision to close NAS Whidbey
  7. 1969-10-30 WNT: Coupeville Field
- **Appendix F: 2016-06-25 E-mail From Captain Geoffrey Moore, USN**
- **Appendix G: COER Wants To Get Rid of NASWI**
- **Appendix H: Stats of AvgeekJoe Productions' Facebook Ad**

**NOTE:** Please do not attempt/bother to respond to each paragraph in these appendices, they are simply source material for your reference to fine-tune the EIS and solidify my remarks.

Respectfully;



## APPENDIX A: 2013 SAVE OLF COUPEVILLE PETITION COVER SHEET

## SAVE OLF COUPEVILLE



[The Petition](#) [1](#) [Highlight](#) [2](#) [Comments](#) [1626](#) [Signatures](#)

TO THE UNITED STATES NAVY; REAR ADMIRAL BOLIVAR, NAVY REGION NORTHWEST; NAS WHIDBEY ISLAND CAPTAIN NORTIER, BUT MOST OF ALL TO THE ELECTRONIC ATTACK WING, US PACIFIC FLEET THROUGH CO CAPTAIN SPRINGETT II AND XO CAPTAIN WALKER...

Where Citizen's of Ebey's Reserve have sued the US Navy over OLF Coupeville (KNRA, America's OLF) **AFTER** being required since 1992 in Island County Code to sign at the point of sale noise disclosure forms noting the presence of a military jet soundtrack... we have a message for you:

**a) We appreciate the superheroic service of all in the Electronic Attack Wing U.S. Pacific Fleet keeping America safe. You inspire and motivate almost all of your fellow Americans to be better Americans!** So we're going to get your backs... for once.

**b) We oppose the threat to sailors' safety, our nation's defense and the regional economy the closure of OLF Coupeville would represent.**

**c) We call upon the United States Navy to agree to an EIS with Citizen's of Ebey's Reserve in return for tolerance of OLF operations so that US Navy representatives can finally discuss with the general public and not just select audiences:**

>Why America's OLF is so vital to the national defense.

>What exactly an alternative OLF would cost at say preferably Skagit Regional Airport (KBVS), or possibly Quillayute Airport (KUIL), the Yakima



Firing Range, or Hanford Nuclear Reservation *versus* eminent domain around OLF Coupeville (KNRA).

>How we can mitigate the impacts from OLF Coupeville, whether that be a tourism campaign to recruit international aviation fans to see OLF Coupeville now that America's OLF on a schedule, text messages 15 minutes before OLF Coupeville use, better Island County Planning policies, and/or eminent domain.

**d)** We have news for Ken Pickard, President of the Citizens of the Ebey's Reserve: You have said "close the base" and "the NAS base keeps the Island dysfunctional". We say instead: "**Keep NAS Whidbey Island and OLF Coupeville open until world peace, which we all hope is soon.**"

**e)** **This better be EA-18G Growling loud to Electronic Attack Wing, US Pacific Fleet: Any** remaining silence from your real friends ends. A reach for a temporary restraining order against training at OLF Coupeville for the freedom of all 3,143 counties is beyond the pale and deserves a most blunt response in gratitude for your superheroic service.

**KEEP 'EM GROWLING AND PROWLING...** BUT *YOU COME HOME TO US!*  
THANK YOU SO MUCH!!

SPONSOR



**APPENDIX B: 2016-07-14 E-MAIL FROM CAPTAIN GEOFFREY MOORE, USN**

**From:** Moore, Geoffrey C CAPT CO NAS Whidbey Is, N00  
**To:** [Helen Price Johnson](mailto:Helen.Price.Johnson@co.island.wa.us)  
**Cc:** Pam Dill  
**Subject:** RE: OLF flights too low  
**Date:** Thursday, July 14, 2016 8:15:46 AM  
**Attachments:** [smime.p7s](#)

Thanks Helen for forwarding your concern and I'll relay to the Growler wing.

Note, the crews cover altitude adherence in every brief before every OLF Coupeville flight--not only because of the requirement to adhere to our air operations manual, but because it is important to be on altitude and airspeed when a pilot commences their 180 degree descending profile to landing. Any failure to be on altitude--high or low--will most often result in a poor landing pass. I liken it to a boat's approach to a pier--if you start your transition with too much speed, the work load is significantly higher as you have to decelerate more than normal, therefore increasing the odds of overrunning the pier or hitting it with higher than desirable speed.

It's the same thing in the aircraft, only with speed, altitude, and maintaining an optimal abeam distance from the runway. As we develop muscle memory for the approach, it is a disadvantage to be high or low, fast or slow from the ideal starting point when one commences their landing approach; in this situation the pilot will have to work harder to get the aircraft back on parameters as they make the approach which will more likely than not result in a less than optimal landing or waveoff. Another way to look at it--not being on altitude or airspeed or at proper distance from the runway is like a professional batter not being ready to swing when the pitcher commences their windup--they will most likely never catch up.

Failure to hit their parameters when flying our Field Carrier Landing Practice approaches at Ault Field or OLF Coupeville will only be more pronounced when a pilot makes their approach to the moving flight deck on the carrier--this is why our Landing Signal Officers constantly emphasize this as they review each pass. I didn't get to monitor much of the FCLP's at the OLF on Monday on my way to Greenbank Farms for our Lake Hancock open house, but what I did see seemed to be a normal pattern. (The Open House went well, a lot of participation and good feedback from the public. The majority were in favor of our preferred alternative.)

Sincerely,

CAPT Geoff 'Jefe' Moore  
 Commanding Officer, NAS Whidbey Island  
[Geoffrey.Moore@navy.mil](mailto:Geoffrey.Moore@navy.mil)  
 Office Phone: 360.257.2037

"For OFFICIAL USE ONLY (FOUO) - This email and attached files may contain Privacy Sensitive information or Law Enforcement Sensitive Information. Any misuse or unauthorized disclosure may result in both civil and criminal penalties. If you received this document in error, please notify me at the above phone number and destroy the document immediately in accordance with Privacy Act procedures."

-----Original Message-----

**From:** Helen Price Johnson [<mailto:H.Price.Johnson@co.island.wa.us>]  
**Sent:** Tuesday, July 12, 2016 9:33 AM  
**To:** Moore, Geoffrey C CAPT CO NAS Whidbey Is, N00  
**Cc:** Pam Dill  
**Subject:** [Non-DoD Source] OLF flights too low

Capt. Moore,

I am getting reports from residents that some of the pilots were flying especially low yesterday. This greatly intensifies the noise impact and is not necessary. Please help to minimize the impact to the local farming community by encouraging the trainees to stay well above the treetops when passing over these workers today and in the future.

Thank you for your help,  
 Helen Price Johnson

Island County Commissioner, District 1

Sent from my Verizon Wireless 4G LTE DROID

Appendix C

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District Judge Thomas S. Zilly

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CITIZENS OF THE EBEBY'S RESERVE  
FOR A HEALTHY, SAFE & PEACEFUL  
ENVIRONMENT,

Plaintiff,

v.

U.S. DEPARTMENT OF THE NAVY;  
ADMIRAL PHIL DAVIDSON, in his  
official capacity as the Commander, Fleet  
Forces Command; and CAPTAIN MIKE  
NORTIER, in his official capacity as  
Commander Naval Air Station Whidbey  
Island,

Defendants,

No. 2:13-cv-1232-TSZ

DECLARATION OF CAPTAIN BENJAMIN  
HEWLETT

I, Captain Benjamin Hewlett, U.S. Navy, Commander, Carrier Air Wing ONE, do hereby  
declare as follows:

1. As Commander, Carrier Air Wing ONE ("CAG"), I am responsible for Airborne Electronic  
Attack Squadron 137, an EA-18G squadron home-based at NAS Whidbey Island. The EA-18G  
aircraft is essential to mission success. Field Carrier Landing Practice ("FCLP") training

1 provides EA-18G pilots with the necessary training that they need to safely land on a carrier after  
2 flying demanding missions, sometimes multiple times a day.

3 2. As CAG, I am responsible to the Commander of Carrier Strike Group TWELVE (a one-star  
4 Admiral) for the safe operation and mission accomplishment of all military aircraft launched and  
5 recovered from the Nimitz-class aircraft carrier USS THEODORE ROOSEVELT ("TR") (CVN  
6 71).

7 3. I was designated a Naval Aviator following completion of advanced aviator training in  
8 January 1995. Over the past 20 years, I have served as an operational aviator and a flight  
9 instructor, including duty as a Carrier Air Wing Landing Signals Officer, where I was  
10 responsible for the safe and expeditious recovery of all aircraft aboard the aircraft carrier. I have  
11 held several leadership roles at the squadron level, including a tour as a squadron commanding  
12 officer. I have served six tours on board aircraft carriers, including three deployments in support  
13 of Operation ENDURING FREEDOM ("OEF") flying combat missions into Afghanistan. I  
14 have flown approximately 3,500 mishap free flight hours, primarily in the S-3 Viking and the  
15 F/A-18C Hornet. I have personally flown the EA-18G "Growler" on numerous occasions, and I  
16 have flown out of NAS Whidbey Island and practiced FCLPs at Outlying Landing Field ("OLF")  
17 Coupeville. I have 760 carrier-arrested landings.

18 4. As CAG, my air wing is broken up into seven "squadrons" of aircraft. Each squadron is led  
19 by its own commanding officer and has a slightly different mission and set of capabilities. There  
20 is only one squadron on board that operates the highly advanced EA-18G aircraft—Airborne  
21 Electronic Attack Squadron 137 (VAQ-137), which is home-based in Whidbey Island,  
22 Washington. VAQ-137 has nine pilots and five jets. Due to the highly specialized nature of the  
23 Electronic Attack mission and the relatively small number of aircraft assigned, the EA-18G is a  
24 "high demand, low density" aircraft. VAQ-137 operates less than half the number of jets as my  
25 other squadrons. Even though they are small in number, they are critically important to not only  
26 major combat operations, but to the prevention of conflict. They make an impact across the  
27 spectrum of U.S. military operations that belies their small size.

28 5. EA-18G pilots fly daily in support of Operation INHERENT RESOLVE ("OIR"), the  
29 coalition military operation against the group commonly known as the Islamic State of Iraq and  
30 the Levant ("ISIL"). These flights are many hours in duration, supporting both U.S. and coalition  
31 forces engaged in the fight against ISIL. It is not unusual for a single aircraft to fly multiple  
32 missions in any given day. To support this, aviators operate on an intense and exhausting  
33 schedule. The EA-18G is critical to the success of the entire effort at the tactical, operational  
34 and strategic levels, so much so that if an EA-18G aircraft cannot support operations due to  
35 needed repairs or aviator unavailability, it is frequently the case that the mission is aborted.

36 6. The mission and tactical actions of the EA-18G in support of this operation are classified, but  
37 are crucial to the U.S. and coalition mission both in the air and on the ground. These aircraft and  
38 their highly trained aircrew deny the enemy freedom of action in the electromagnetic spectrum.  
39 They achieve this through the employment of their tactical jamming systems in support of both  
40 ground and air forces engaged against ISIL.

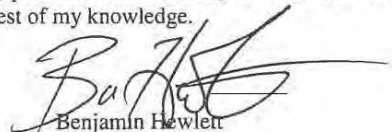
1 7. In order to effectively execute the mission against ISIL, TR and her aviators must operate in  
2 very confined water and air space in the Arabian Gulf. This water and air space includes not  
3 only all of the ships and aircraft from the Strike Group and my Air Wing, but also ships and  
4 aircraft from other Gulf State navies, air forces, and coast guards, as well as oil rigs, commercial  
5 shipping and air traffic. This complex operating environment makes aircraft launch and recovery  
6 exponentially more challenging than open-ocean operations. While the sequencing of aircraft  
7 launches is predictable, occurring approximately every 30 seconds, the sequencing of aircraft  
8 recovery is highly dynamic. The expeditious recovery of aircraft is absolutely critical to the  
9 safety of the ship, her crew and all other vessels and interests in the area. During aircraft  
10 recovery the aircraft carrier must maintain a constant course and speed, thus restricting the ship's  
11 maneuverability. If it takes longer to recover aircraft because undertrained aviators are unable to  
12 land on their first approach it increases already substantial risks and makes it difficult for the ship  
13 to avoid the unpredictable hazards that can rapidly develop. Aviators returning to the ship are  
14 especially taxed by the intensity of operations, so their skills absolutely must be second nature  
15 and perfected before deployment. Any deficiency in an aircrew's training prior to embarking on  
16 an aircraft carrier increases risk not only the lives of the aviators, but those sailors on the flight  
17 deck that are mere feet from the aircraft as it takes off or lands.

18 8. In any 24-hour period, over 100 jet and helicopter launches and recoveries are performed by a  
19 team of hundreds of dedicated sailors working together on the flight deck. The rapid launch,  
20 recovery, refueling, and rearming of aircraft from an aircraft carrier is a complex task involving  
21 pilots, maintenance personnel, and support personnel and represents a highly specialized system  
22 of operations unique to naval aviation, which must be choreographed and executed with  
23 precision. Naval personnel must learn how to launch, recover, refuel and rearm aircraft,  
24 concurrently, at night, often in bad weather, on an aircraft carrier flight deck. In those  
circumstances, safety is paramount: the constant threat posed by jet engine intakes and exhausts,  
turning propellers, and moving aircraft makes the aircraft carrier flight deck an extremely  
dangerous work environment.

8. Night carrier operations are the highest risk operations in aviation, but night combat  
operations are critical to mission success because of the diminished capability of the enemy to  
respond to coalition and U.S. ground and air operations. Every night, EA-18G aviators land  
aboard ship, often in a pitch-black environment with rolling seas. Their combat missions are  
fatiguing and dangerous. Periodically, storms will move through the area, making seas  
unpredictable. Additionally, the environment in the Arabian Gulf is frequently hazy with low  
visibility. These poor environmental conditions significantly affect carrier flight operations in  
many different ways, and aviators must be well-trained and proficient in order to respond to the  
unique requirements of the different circumstances that are encountered. The dynamic and high  
risk nature of night carrier operations requires very strict night Field Carrier Landing Practice  
(FCLP) periodicities for aircrew proficiency prior to embarking the ship for any at sea period in  
order to ensure the an acceptable level of risk is maintained. Carrier landings are a perishable  
skill, and Navy policy mandates that FCLP training should be conducted within five days of  
landing on the aircraft carrier and must in no case be conducted more than 10 days prior to  
landing on the carrier. Having conducted FCLPs at OLF Coupeville, I believe OLF Coupeville  
provides a realistic environment in which to practice FCLPs. Any degradation of the ability for  
VAQ-137 to conduct FCLPs in an environment as ideal as OLF Coupeville prior to embarking

1 aboard ship will degrade U.S. and coalition combat effectiveness while creating unacceptable  
2 risks for the aviators and crewmembers aboard TR.

3 I hereby swear under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing  
4 information is true and correct to the best of my knowledge.

  
Benjamin Hewlett  
Captain, U.S. Navy

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Appendix D

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District Judge Thomas S. Zilly

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CITIZENS OF THE EBEBY'S RESERVE  
FOR A HEALTHY, SAFE & PEACEFUL  
ENVIRONMENT,

Plaintiff,

v.

U.S. DEPARTMENT OF THE NAVY;  
ADMIRAL PHIL DAVIDSON, in his  
official capacity as the Commander, Fleet  
Forces Command; and CAPTAIN MIKE  
NORTIER, in his official capacity as  
Commanding Officer Naval Air Station  
Whidbey Island,

Defendants,

No. 2:13-cv-1232-TSZ

DECLARATION OF CAPTAIN MICHAEL  
NORTIER

I, Captain Michael Nortier, U.S. Navy, Commanding Officer, Naval Air Station Whidbey Island, do hereby declare as follows:

1. I have extensive experience in Navy operations and currently serve as Commanding Officer of Naval Air Station ("NAS") Whidbey Island. In my experience, shifting all Field Carrier Landing Practice ("FCLP") operations from Outlying Field ("OLF") Coupeville degrades the quality of

NORTIER DECLARATION

- 1 -

U.S. Department of Justice  
7600 Sand Point Way NE  
Seattle, WA 981115

1 training for EA-18G pilots practicing for dangerous carrier landings; negatively impacts all other  
2 operations at NAS Whidbey Island; and increases impacts to the community near Ault Field.

### 3 BACKGROUND

4 2. I was commissioned as a Naval Officer through the Naval Reserve Officer Training Corps in  
5 1990, and was designated a Naval Aviator in 1991. Over the course of 25 years in the Navy, I  
6 have been assigned to various squadrons, have held numerous positions, and have embarked on  
7 many ships in support of deployed operations. I was particularly involved in aviation safety  
8 during my tour as the Air Operations Officer for Commander, Carrier Strike Group Seven,  
9 embarked on USS RONALD REAGAN (CVN 76) in 2009. In addition to my duties as Air  
10 Operations Officer, I served as Strike Group Seven Safety Officer, interacting with Carrier Air  
11 Wing FOURTEEN and USS RONALD REAGAN on all safety related matters, including  
12 aviation safety. This assignment included a deployment to the Arabian Gulf in 2009, Rim of the  
13 Pacific Exercise off the coast of Hawaii in 2010 and a Western Pacific deployment in 2011. I  
14 have also served on the staff of the U.S. Pacific Fleet in the Operations directorate and deployed  
15 with the Army to Iraq in 2012. Over the last 25 years I have accumulated over 4,300 flight hours  
16 in naval aircraft and have worked with a variety of platforms deployed to carriers and surface  
17 combatants.

### 11 NAS WHIDBEY ISLAND

12 3. I have been the Commanding Officer of NAS Whidbey Island since February 2013. As  
13 Commanding Officer, I have overall responsibility for all daily base facility and air operations on  
14 and around NAS Whidbey Island, which includes activities at Ault Field and Outlying Landing  
15 Field ("OLF") Coupeville. Both airfields are located on Whidbey Island, with the OLF  
16 approximately 10 miles south, by air, from Ault Field. I am responsible for executing,  
17 coordinating, and integrating shore installation services and support functional programs in  
18 support of Navy operational missions. NAS Whidbey Island is the only naval aviation  
19 installation in the Pacific Northwest. For over 40 years, NAS Whidbey Island has been the home  
20 of all Navy Electronic Attack (VAQ) squadrons in the United States. The VAQ community is  
21 made up of EA-18G "Growler" aircraft supporting Navy carrier fleet and Department of Defense  
22 expeditionary missions. The predecessor to the Growler was the EA-6B "Prowler."

23 4. Ault Field supports an average of 65,000 military operations a year, comprising operations  
24 from aircraft home-based at NAS Whidbey Island, including fourteen electronic attack  
25 squadrons, five maritime patrol and reconnaissance squadrons, one logistics squadron, and one  
26 search and rescue helicopter unit, as well as operations from other transient military aircraft.

### 21 FIELD CARRIER LANDING PRACTICE

22 5. Unlike other aircraft takeoffs, which climb to altitude and depart the local area, aircraft  
23 conducting Field Carrier Landing Practice (FCLP) training take off and remain within 3-4 miles  
24 of the airfield during the entire evolution. When an FCLP period is occurring with multiple  
25 aircraft, this is generally considered a closed pattern, which means that other aircraft cannot take  
26 off or land.

### 25 NORTIER DECLARATION

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OLF COUPEVILLE

6. OLF Coupeville has one runway oriented generally North/South, and is called runway 32 or runway 14, depending on direction of approach. The weather and winds determine the direction in which to conduct FCLPs. The local prevailing winds support runway 32 usage most of the year. FCLP flight patterns for OLF Coupeville were historically used by the EA-6B and A-6 aircraft, which shared similar flight characteristics. In the past, the flight pattern for runway 14 was adjusted for noise abatement purposes for homes on the eastern coastal boundary. Additionally, noise abatement procedures were designed to avoid flying over Long Point and a bird farm that is no longer in existence, and those procedures are still followed. Even with these modifications to the pattern, the EA-6B and A-6 could operate within acceptable parameters and use runway 14 when the meteorological conditions favored this runway. The EA-18G has a slightly different required flight profile in the FCLP pattern due to differences in weight and flight characteristics. As a result, the EA-18G cannot safely operate within the confines of the daytime runway 14 parameters currently in place. The Navy is examining runway usage and historical noise abatement procedures as part of its ongoing EA-18G Environmental Impact Study. Until that study is complete, runway 14 is rarely used for FCLPs.

7. I was in command of NAS Whidbey Island on June 28, 2013 when U.S. Fleet Forces halted flight operations at OLF Coupeville, and when FCLPs at OLF Coupeville resumed in January 2014. Ault Field was utilized to meet most of the remaining FCLP training requirements for that year. The suspension of flight operations at OLF Coupeville created operational impacts that were not sustainable, either as a permanent solution or as a temporary solution extending much longer than what was experienced in 2013.

8. During November of 2013, as several squadrons conducted FCLPs in preparation for deploying on aircraft carriers, other aircraft awaiting departures and arrivals encountered extensive delays, in some cases greater than 45 minutes. The back-up of aircraft waiting to take off or land accumulates when closed-pattern FCLPs are conducted at Ault Field. Because FCLPs are so closely sequenced, non-FCLP aircraft must hold on the taxiway to await a gap in flying to safely depart. Backups on the airport taxiways due to FCLPs lead to missed training windows in military operations areas (MOAs) and military training routes (MTRs), which are tightly scheduled to meet the requirements of 20 squadrons assigned to NAS Whidbey Island.<sup>1</sup> In order to relieve the congestion on the ground in 2013, the air traffic controllers had to create space between airborne FCLP aircraft—to create an opening in what is normally a closed

<sup>1</sup> MOAs and MTRs are subsets of special use airspace (SUA) established by the FAA. They have specific vertical and horizontal boundaries within which military aircraft conduct training. NAS Whidbey Island schedules MOA and MTR use and deconflicts scheduling with other route users. NAS Whidbey Island provides flight altitudes, route widths, and times to Flight Service Stations, which in turn are responsible for providing that information to the general aviation public for safety. Therefore, in the interest of flight safety, and to allow sufficient time to disseminate the advisory information, MTR entry times are firm. Entry onto Instrument Route MTRs must be within five minutes, and entry onto Visual Route MTRs must be within three minutes of scheduled times. Missed SUA times results in missed training and, therefore, delays or degrades readiness.

1 pattern—so that other aircraft could take off or land. This lengthened the FCLP pattern so that  
 2 aircraft flew outside the standard FCLP patterns. This has a detrimental impact on FCLP  
 3 training, because the pattern being flown no longer closely resembles the pattern flown at sea. It  
 also means that FCLP aircraft fly over different locations in the community than under a  
 standard pattern, which tends to give rise to additional noise complaints.

4 9. The temporary closure of OLF Coupeville in 2013 stressed our capacity to meet training  
 5 requirements in order to support military readiness and caused a greater impact on the  
 6 community surrounding Ault Field. Having to schedule operations at Ault Field around FCLP  
 7 training results in extending the flight hours in a given day to perform other necessary flight  
 8 operations. This means flights occur later in the evening, which increases the duration of the  
 9 impact on the community.

10 10. The population surrounding Ault Field is greater than that surrounding OLF Coupeville,  
 11 which means noise impacts from aircraft operations at Ault Field impact a greater number of  
 12 people than at Coupeville.<sup>2</sup>

13 11. Plaintiff asserts that the Fleet Replacement Squadron (“FRS”) is using five aircraft in the  
 14 pattern during FCLP training. Training requirements only permit up to five aircraft during one  
 15 FCLP session; however, five aircraft are rarely scheduled because the FRS pilots are less  
 16 experienced at flying the Growler or flying in the vicinity of NAS Whidbey Island, so they will  
 17 normally only schedule up to four aircraft. FRS pilots are more likely to need this extra cushion  
 18 in order to keep the FCLP pattern within the lateral limits of the OLF.

#### 19 OLF COUPEVILLE NOISE ABATEMENT AND MITIGATION MEASURES

20 12. NAS Whidbey Island has established noise abatement and mitigation measures. These  
 21 measures consist of working with our local communities to modify flight operations to minimize  
 22 our impact when possible. My staff and I meet often with elected officials, school  
 23 representatives, and community organizations and groups. When schools notify us about their  
 24 testing schedules, we adjust our flights if weather conditions allow. During weekends, we  
 25 minimize flights at OLF Coupeville to limit disturbance. Additionally, in an attempt to make the  
 public more aware of our planned operations, we continue to publish flight schedules for OLF  
 Coupeville on the NAS Whidbey Island website and Facebook page, and in the local media  
 outlets such as Whidbey News Times one week in advance. We send this flight schedule to a  
 wide range of area media outlets to ensure maximum distribution of the information. In 2014,  
 we worked with the Mayor of Coupeville and Island County Commissioner to identify  
 community events and publish a planning schedule that covered the summer to allow the  
 community to be assured OLF Coupeville operations would not impact these events.

13. As Commanding Officer of NAS Whidbey Island, I make every effort to minimize the  
 Navy’s impact on surrounding communities when possible, recognizing that flight schedules are

<sup>2</sup> Population data shows that in 2010, Coupeville, Washington population was 1,831 and Oak  
 Harbor, Washington population was 22,075. See Attachment 1.

1 dictated by training and deployment schedules. NAS Whidbey Island practices noise abatement  
2 and mitigation procedures to control the routing of routine flights to minimize overflight of  
populated areas.

3 14. My staff and I work with the local communities to promote development compatible with air  
4 operations. The 2005 AICUZ provides Navy recommendations for compatible land use and is a  
publicly available document. This information is shared with the prospective home buyers in the  
5 area upon request, and it is also easily found online.

6 15. Accident Potential Zones (“APZs”) are planning tools for local planning agencies and are  
7 governed by Navy instruction (OPNAVINST 11010.36C). APZs are areas where an analysis of  
8 historical flight data shows an aircraft mishap is most likely to occur should one occur. They do  
9 not reflect the probability of an accident. Accidents near OLF Coupeville are very rare. APZs  
10 follow arrival, departure and pattern flight tracks. The requirement to establish APZs is  
11 dependent on the number of flight operations that occur in a particular flight track at the runway  
12 or airfield. Not all runways or airfields require an APZ. A runway or airfield requires APZs  
13 when 5,000 or more flight operations occur annually over a specific flight track. For purposes of  
14 APZs, a flight operation is considered a landing or a takeoff, but not both combined. In other  
words, an APZ is required if a flight track has 5,000 take offs or 5,000 landings, but not 2,500 of  
each. It should be noted that flight operations for FCLPs are calculated differently than  
operations for APZs. Each FCLP is counted twice, or two operations. One operation is the  
landing, and one is the takeoff. Accordingly, if OLF Coupeville experiences 6,120 FCLP  
operations, that would equate to 3,060 landings, and 3,060 takeoffs, which does not meet the  
5,000 take-off or landing threshold for establishment of an APZ for flight tracks at OLF  
Coupeville’s runway 14 or runway 32. OLF Coupeville does not currently experience the  
requisite number of operations per flight track and, therefore, per Navy direction, does not  
require APZs.

15 OLF COUPEVILLE FCLP DATA

16 16. During the entire year of 2014, Navy aircraft conducted FCLPs at OLF Coupeville over 44  
17 days, all during the work week; of those 44 days, 14 days included acoustic night operations (that  
18 is, between 10 p.m. and 7 a.m.) with only two of the acoustic night operations extending past  
19 midnight (June 26 and Aug 12). Since January 2015, Navy aircraft have conducted FCLPs at  
OLF Coupeville for 20 days, all during the work week; of those 20 days, only one day included  
acoustic night and that single event ended at 10:57 p.m. Please see Attachment 2 for specific  
times that 2014 and 2015 FCLPs started and finished.

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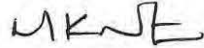
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25 NORTIER DECLARATION

1 CONCLUSION

2 17. Significant changes such as enjoining FCLPs at OLF Coupeville will result in detrimental  
3 effects to airfield operations and military aircrew training, and increased impacts to the  
4 communities surrounding Ault Field.

5 I hereby swear under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing  
6 information is true and correct to the best of my knowledge.



7 Michael Nortier  
8 Captain, U.S. Navy

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NORTIER DECLARATION

- 6 -

# **Attachment 1**

# Attachment 1

**OLF FLIGHT HOURS**

Day	Jan-14		Jan-14		Night Start	Night End	Total Day	Total Night	Total Day and Night	
	Start Time	End Time	Start Time	End Time						
1							0:00	0:00	0:00	
2							0:00	0:00	0:00	
3							0:00	0:00	0:00	
4							0:00	0:00	0:00	
5							0:00	0:00	0:00	
6	14:32	19:20					4:48	0:00	4:48	
7							0:00	0:00	0:00	
8							0:00	0:00	0:00	
9							0:00	0:00	0:00	
10							0:00	0:00	0:00	
11							0:00	0:00	0:00	
12							0:00	0:00	0:00	
13	14:00	14:30	15:27	16:26			1:29	0:00	1:29	
14							0:00	0:00	0:00	
15	16:35	17:17					0:42	0:00	0:42	
16							0:00	0:00	0:00	
17							0:00	0:00	0:00	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27							0:00	0:00	0:00	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
31							0:00	0:00	0:00	
							<b>Monthly Total</b>	6:59	0:00	6:59

### OLF FLIGHT HOURS

Feb-14

Day	Start Time	End Time	Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night
1							0:00	0:00	0:00
2							0:00	0:00	0:00
3							0:00	0:00	0:00
4							0:00	0:00	0:00
5							0:00	0:00	0:00
6							0:00	0:00	0:00
7							0:00	0:00	0:00
8							0:00	0:00	0:00
9							0:00	0:00	0:00
10							0:00	0:00	0:00
11							0:00	0:00	0:00
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21							0:00	0:00	0:00
22							0:00	0:00	0:00
23							0:00	0:00	0:00
24							0:00	0:00	0:00
25							0:00	0:00	0:00
26							0:00	0:00	0:00
27							0:00	0:00	0:00
28							0:00	0:00	0:00
						<b>Monthly Total</b>	0:00	0:00	0:00



**OLF FLIGHT HOURS**

Mar-14										
Day	Start Time	End Time	Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night	
1							0:00	0:00	0:00	
2							0:00	0:00	0:00	
3							0:00	0:00	0:00	
4							0:00	0:00	0:00	
5							0:00	0:00	0:00	
6							0:00	0:00	0:00	
7							0:00	0:00	0:00	
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25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27							0:00	0:00	0:00	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
31							0:00	0:00	0:00	
							<b>Monthly Total</b>	0:00	0:00	0:00

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Apr-14			Total Day	Total Night	Total Day and Night	
			Start Time	End Time	Night Start				Night End
1						0:00	0:00	0:00	
2						0:00	0:00	0:00	
3						0:00	0:00	0:00	
4						0:00	0:00	0:00	
5						0:00	0:00	0:00	
6						0:00	0:00	0:00	
7						0:00	0:00	0:00	
8						0:00	0:00	0:00	
9						0:00	0:00	0:00	
10						0:00	0:00	0:00	
11						0:00	0:00	0:00	
12						0:00	0:00	0:00	
13						0:00	0:00	0:00	
14						0:00	0:00	0:00	
15						0:00	0:00	0:00	
16						0:00	0:00	0:00	
17						0:00	0:00	0:00	
18						0:00	0:00	0:00	
19						0:00	0:00	0:00	
20						0:00	0:00	0:00	
21						0:00	0:00	0:00	
22						0:00	0:00	0:00	
23						0:00	0:00	0:00	
24						0:00	0:00	0:00	
25	12:00	14:15				2:15	0:00	2:15	
26						0:00	0:00	0:00	
27						0:00	0:00	0:00	
28						0:00	0:00	0:00	
29						0:00	0:00	0:00	
30						0:00	0:00	0:00	
						<b>Monthly Total</b>	2:15	0:00	2:15

**OLF FLIGHT HOURS**

Day	Start Time	End Time	May-14				Total Day	Total Night	Total Day and Night
			Start Time	End Time	Night Start	Night End			
1	20:45	22:00			22:00	23:07	1:15	1:07	2:22
2							0:00	0:00	0:00
3							0:00	0:00	0:00
4							0:00	0:00	0:00
5							0:00	0:00	0:00
6	14:06	16:11	21:04	22:00	22:00	23:09	3:01	1:09	4:10
7	19:08	21:09					2:01	0:00	2:01
8							0:00	0:00	0:00
9							0:00	0:00	0:00
10							0:00	0:00	0:00
11							0:00	0:00	0:00
12							0:00	0:00	0:00
13							0:00	0:00	0:00
14							0:00	0:00	0:00
15							0:00	0:00	0:00
16							0:00	0:00	0:00
17							0:00	0:00	0:00
18							0:00	0:00	0:00
19							0:00	0:00	0:00
20							0:00	0:00	0:00
21							0:00	0:00	0:00
22							0:00	0:00	0:00
23							0:00	0:00	0:00
24							0:00	0:00	0:00
25							0:00	0:00	0:00
26							0:00	0:00	0:00
27	14:06	17:29					3:23	0:00	3:23
28	19:48	22:00			22:00	23:27	2:12	1:27	3:39
29							0:00	0:00	0:00
30							0:00	0:00	0:00
31							0:00	0:00	0:00
<b>Monthly Total</b>							11:52	3:43	15:35

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Jun-14		Night Start	Night End	Total Day	Total Night	Total Day and Night
			Start Time	End Time					
1							0:00	0:00	0:00
2							0:00	0:00	0:00
3	18:30	18:56					0:26	0:00	0:26
4	16:37	18:32					1:55	0:00	1:55
5	16:40	18:39					1:59	0:00	1:59
6							0:00	0:00	0:00
7							0:00	0:00	0:00
8							0:00	0:00	0:00
9							0:00	0:00	0:00
10							0:00	0:00	0:00
11							0:00	0:00	0:00
12							0:00	0:00	0:00
13							0:00	0:00	0:00
14							0:00	0:00	0:00
15							0:00	0:00	0:00
16							0:00	0:00	0:00
17	18:20	18:41					0:21	0:00	0:21
18							0:00	0:00	0:00
19	17:09	17:37					0:28	0:00	0:28
20	11:24	13:50					2:26	0:00	2:26
21							0:00	0:00	0:00
22							0:00	0:00	0:00
23	21:56	22:00			22:00	22:26	0:04	0:26	0:30
24	21:48	22:00			22:00	23:39	0:12	1:39	1:51
25	21:53	22:00			22:00	23:50	0:07	1:50	1:57
26					22:11	0:00	0:00	1:49	1:49
27					0:00	0:17	0:00	0:17	0:17
28							0:00	0:00	0:00
29							0:00	0:00	0:00
30					22:11	23:43	0:00	1:32	1:32
					<b>Monthly Total</b>		7:58	7:33	15:31

**OLF FLIGHT HOURS**

Jul-14							Total Day	Total Night	Total Day and Night
Day	Start Time	End Time	Start Time	End Time	Night Start	Night End			
1							0:00	0:00	0:00
2	11:58	13:56					1:58	0:00	1:58
3							0:00	0:00	0:00
4							0:00	0:00	0:00
5							0:00	0:00	0:00
6							0:00	0:00	0:00
7	12:13	16:19					4:06	0:00	4:06
8							0:00	0:00	0:00
9							0:00	0:00	0:00
10							0:00	0:00	0:00
11							0:00	0:00	0:00
12							0:00	0:00	0:00
13							0:00	0:00	0:00
14							0:00	0:00	0:00
15							0:00	0:00	0:00
16							0:00	0:00	0:00
17							0:00	0:00	0:00
18							0:00	0:00	0:00
19							0:00	0:00	0:00
20							0:00	0:00	0:00
21							0:00	0:00	0:00
22							0:00	0:00	0:00
23							0:00	0:00	0:00
24							0:00	0:00	0:00
25							0:00	0:00	0:00
26							0:00	0:00	0:00
27							0:00	0:00	0:00
28							0:00	0:00	0:00
29							0:00	0:00	0:00
30	12:28	13:16					0:48	0:00	0:48
31							0:00	0:00	0:00
<b>Monthly Total</b>							6:52	0:00	6:52

**OLF FLIGHT HOURS**

Day	Aug-14						Night Start	Night End	Total Day	Total Night	Total Day and Night	
	Start Time	End Time	Start Time	End Time	Start Time	End Time						
1								0:00	0:00	0:00		
2								0:00	0:00	0:00		
3								0:00	0:00	0:00		
4								0:00	0:00	0:00		
5								0:00	0:00	0:00		
6								0:00	0:00	0:00		
7								0:00	0:00	0:00		
8								0:00	0:00	0:00		
9								0:00	0:00	0:00		
10								0:00	0:00	0:00		
11	19:14	21:10						1:56	0:00	1:56		
12	15:43	17:36	19:12	22:00			22:00	0:00	4:41	2:00	6:41	
13							0:00	0:30	0:00	0:30	0:30	
14								0:00	0:00	0:00	0:00	
15								0:00	0:00	0:00	0:00	
16								0:00	0:00	0:00	0:00	
17								0:00	0:00	0:00	0:00	
18	8:29	11:38	20:13	22:00			22:00	23:59	4:56	1:59	6:55	
19	20:42	22:00					22:00	0:00	1:18	2:00	3:18	
20									0:00	0:00	0:00	
21	20:44	22:00					22:00	23:54	1:16	1:54	3:10	
22	11:33	14:38							3:05	0:00	3:05	
23									0:00	0:00	0:00	
24									0:00	0:00	0:00	
25	17:35	18:03	20:19	22:00			22:00	23:56	2:09	1:56	4:05	
26	15:25	17:24	20:22	21:04					2:41	0:00	2:41	
27	17:38	18:07	19:21	20:51					1:59	0:00	1:59	
28	13:35	14:09	15:01	15:36	16:22	17:01			1:48	0:00	1:48	
29									0:00	0:00	0:00	
30									0:00	0:00	0:00	
31									0:00	0:00	0:00	
<b>Monthly Total</b>										<b>25:49</b>	<b>10:19</b>	<b>36:08</b>

**OLF FLIGHT HOURS**

Sep-14										
Day	Start Time	End Time	Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night	
1							0:00	0:00	0:00	
2							0:00	0:00	0:00	
3	15:46	16:17	16:36	17:08			1:03	0:00	1:03	
4	16:31	17:18					0:47	0:00	0:47	
5							0:00	0:00	0:00	
6							0:00	0:00	0:00	
7							0:00	0:00	0:00	
8							0:00	0:00	0:00	
9	15:36	17:34					1:58	0:00	1:58	
10	15:49	16:19					0:30	0:00	0:30	
11	15:39	17:21					1:42	0:00	1:42	
12							0:00	0:00	0:00	
13							0:00	0:00	0:00	
14							0:00	0:00	0:00	
15							0:00	0:00	0:00	
16							0:00	0:00	0:00	
17							0:00	0:00	0:00	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27							0:00	0:00	0:00	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
							<b>Monthly Total</b>	6:00	0:00	6:00

**OLF FLIGHT HOURS**

Day	Oct-14						Night Start	Night End	Total Day	Total Night	Total Day and Night
	Start Time	End Time	Start Time	End Time	Start Time	End Time					
1								0:00	0:00	0:00	
2								0:00	0:00	0:00	
3	10:51	11:47	12:18	14:40	18:31	21:37		6:24	0:00	6:24	
4								0:00	0:00	0:00	
5								0:00	0:00	0:00	
6								0:00	0:00	0:00	
7								0:00	0:00	0:00	
8								0:00	0:00	0:00	
9								0:00	0:00	0:00	
10								0:00	0:00	0:00	
11								0:00	0:00	0:00	
12								0:00	0:00	0:00	
13								0:00	0:00	0:00	
14								0:00	0:00	0:00	
15								0:00	0:00	0:00	
16								0:00	0:00	0:00	
17	10:28	14:39						4:11	0:00	4:11	
18								0:00	0:00	0:00	
19								0:00	0:00	0:00	
20	18:30	19:15	19:48	22:00			22:00	2:57	0:05	3:02	
21								0:00	0:00	0:00	
22								0:00	0:00	0:00	
23								0:00	0:00	0:00	
24								0:00	0:00	0:00	
25								0:00	0:00	0:00	
26								0:00	0:00	0:00	
27								0:00	0:00	0:00	
28								0:00	0:00	0:00	
29								0:00	0:00	0:00	
30								0:00	0:00	0:00	
31								0:00	0:00	0:00	
							<b>Monthly Total</b>	13:32	0:05	13:37	



**OLF FLIGHT HOURS**

Nov-14										
Day	Start Time	End Time	Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night	
1							0:00	0:00	0:00	
2							0:00	0:00	0:00	
3							0:00	0:00	0:00	
4							0:00	0:00	0:00	
5							0:00	0:00	0:00	
6							0:00	0:00	0:00	
7							0:00	0:00	0:00	
8							0:00	0:00	0:00	
9							0:00	0:00	0:00	
10							0:00	0:00	0:00	
11							0:00	0:00	0:00	
12							0:00	0:00	0:00	
13							0:00	0:00	0:00	
14							0:00	0:00	0:00	
15							0:00	0:00	0:00	
16							0:00	0:00	0:00	
17							0:00	0:00	0:00	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27							0:00	0:00	0:00	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
							<b>Monthly Total</b>	0:00	0:00	0:00

**OLF FLIGHT HOURS**

Dec-14										
Day	Start Time	End Time	Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night	
1	11:30	14:00	17:00	19:15			4:45	0:00	4:45	
2	11:45	14:00					2:15	0:00	2:15	
3							0:00	0:00	0:00	
4							0:00	0:00	0:00	
5							0:00	0:00	0:00	
6							0:00	0:00	0:00	
7							0:00	0:00	0:00	
8							0:00	0:00	0:00	
9							0:00	0:00	0:00	
10							0:00	0:00	0:00	
11							0:00	0:00	0:00	
12							0:00	0:00	0:00	
13							0:00	0:00	0:00	
14							0:00	0:00	0:00	
15							0:00	0:00	0:00	
16	15:15	16:00					0:45	0:00	0:45	
17							0:00	0:00	0:00	
18	9:46	13:05					3:19	0:00	3:19	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27							0:00	0:00	0:00	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
31							0:00	0:00	0:00	
							<b>Monthly Total</b>	11:04	0:00	11:04

**OLF FLIGHT HOURS**

Jan-15										
Day	Start Time	End Time	Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night	
1							0:00	0:00	0:00	
2							0:00	0:00	0:00	
3							0:00	0:00	0:00	
4							0:00	0:00	0:00	
5							0:00	0:00	0:00	
6	15:03	16:03					1:00	0:00	1:00	
7							0:00	0:00	0:00	
8	15:04	15:47					0:43	0:00	0:43	
9							0:00	0:00	0:00	
10							0:00	0:00	0:00	
11							0:00	0:00	0:00	
12							0:00	0:00	0:00	
13							0:00	0:00	0:00	
14	15:05	15:44	17:52	19:30			2:17	0:00	2:17	
15							0:00	0:00	0:00	
16							0:00	0:00	0:00	
17							0:00	0:00	0:00	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27							0:00	0:00	0:00	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
31							0:00	0:00	0:00	
							<b>Monthly Total</b>	4:00	0:00	4:00

**OLF FLIGHT HOURS**

Feb-15

Day	Start Time	End Time	Start Time	End Time	Start Time	Night Start	Night End	Total Day	Total Night	Total Day and Night
1								0:00	0:00	0:00
2								0:00	0:00	0:00
3								0:00	0:00	0:00
4								0:00	0:00	0:00
5								0:00	0:00	0:00
6								0:00	0:00	0:00
7								0:00	0:00	0:00
8								0:00	0:00	0:00
9								0:00	0:00	0:00
10								0:00	0:00	0:00
11								0:00	0:00	0:00
12								0:00	0:00	0:00
13								0:00	0:00	0:00
14								0:00	0:00	0:00
15								0:00	0:00	0:00
16								0:00	0:00	0:00
17								0:00	0:00	0:00
18								0:00	0:00	0:00
19								0:00	0:00	0:00
20								0:00	0:00	0:00
21								0:00	0:00	0:00
22								0:00	0:00	0:00
23								0:00	0:00	0:00
24								0:00	0:00	0:00
25								0:00	0:00	0:00
26								0:00	0:00	0:00
27								0:00	0:00	0:00
28								0:00	0:00	0:00
							<b>Monthly Total</b>	0:00	0:00	0:00

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Start Time	End Time	Start Time	End Time	Mar-15		Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night	
							Start Time	End Time								
1													0:00	0:00	0:00	
2													0:00	0:00	0:00	
3													0:00	0:00	0:00	
4													0:00	0:00	0:00	
5													0:00	0:00	0:00	
6													0:00	0:00	0:00	
7													0:00	0:00	0:00	
8													0:00	0:00	0:00	
9													0:00	0:00	0:00	
10													0:00	0:00	0:00	
11													0:00	0:00	0:00	
12													0:00	0:00	0:00	
13	11:00	11:45	12:30	13:15									1:30	0:00	1:30	
14													0:00	0:00	0:00	
15													0:00	0:00	0:00	
16	13:30	14:05	14:24	15:38	15:44	16:28	17:35	21:35					6:33	0:00	6:33	
17	10:10	13:45	13:55	14:30	15:16	15:59	19:36	20:09	20:58	21:30			5:58	0:00	5:58	
18	20:00	20:50											0:50	0:00	0:50	
19	19:32	21:48											2:16	0:00	2:16	
20													0:00	0:00	0:00	
21													0:00	0:00	0:00	
22													0:00	0:00	0:00	
23													0:00	0:00	0:00	
24	10:30	14:00											3:30	0:00	3:30	
25													0:00	0:00	0:00	
26	18:12	21:26											3:14	0:00	3:14	
27	11:00	14:42											3:42	0:00	3:42	
28													0:00	0:00	0:00	
29													0:00	0:00	0:00	
30	18:10	19:31											1:21	0:00	1:21	
31	10:57	14:10											3:13	0:00	3:13	
													<b>Monthly Total</b>	32:07	0:00	32:07

**OLF FLIGHT HOURS**

Apr-15										
Day	Start Time	End Time	Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night	
1	18:10	21:30					3:20	0:00	3:20	
2	11:21	14:23	18:00	21:28			6:30	0:00	6:30	
3							0:00	0:00	0:00	
4							0:00	0:00	0:00	
5							0:00	0:00	0:00	
6	18:06	21:40					3:34	0:00	3:34	
7							0:00	0:00	0:00	
8	10:40	14:09					3:29	0:00	3:29	
9	13:40	14:30	18:50	19:33			1:33	0:00	1:33	
10							0:00	0:00	0:00	
11							0:00	0:00	0:00	
12							0:00	0:00	0:00	
13							0:00	0:00	0:00	
14							0:00	0:00	0:00	
15							0:00	0:00	0:00	
16	19:15	22:00			22:00	22:57	2:45	0:57	3:42	
17							0:00	0:00	0:00	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27	19:04	20:46					1:42	0:00	1:42	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
							<b>Monthly Total</b>	22:53	0:57	23:50

Annual Total			
2014			
Month	Day	Night	Total
January	6:59	0:00	6:59
February	0:00	0:00	0:00
March	0:00	0:00	0:00
April	2:15	0:00	2:15
May	11:52	3:43	15:35
June	7:58	7:33	15:31
July	6:52	0:00	6:52
August	25:49	10:19	12:08
September	6:00	0:00	6:00
October	13:32	0:05	13:37
November	0:00	0:00	0:00
December	11:04	0:00	11:04
Totals	92:21	21:40	114:01

Annual Total			
2015			
Month	Day	Night	Total
January	4:00	0:00	4:00
February	0:00	0:00	0:00
March	32:07	0:00	32:07
April	22:53	0:57	23:50
Totals	59:00	0:57	59:57

State of Washington

# 2014 Population Trends

**Forecasting & Research Division**  
Office of Financial Management  
November 2014





Table 4 *continued***Populations of Cities, Towns, and Counties: April 1, 2010 to April 1, 2014**

<b>County Municipality</b>	<b>Census 2010</b>	<b>Estimate 2011</b>	<b>Estimate 2012</b>	<b>Estimate 2013</b>	<b>Estimate 2014</b>
<b>Douglas</b>	<b>38,431</b>	<b>38,650</b>	<b>38,900</b>	<b>39,280</b>	<b>39,700</b>
Unincorporated	20,399	20,590	20,760	21,060	21,430
Incorporated	18,032	18,060	18,140	18,220	18,270
Bridgeport	2,409	2,405	2,415	2,425	2,445
Coulee Dam <i>part</i>	187	185	185	185	185
East Wenatchee	13,190	13,220	13,280	13,350	13,370
Mansfield	320	320	325	325	325
Rock Island	788	790	790	790	790
Waterville	1,138	1,140	1,145	1,145	1,155
<b>Ferry</b>	<b>7,551</b>	<b>7,600</b>	<b>7,650</b>	<b>7,650</b>	<b>7,660</b>
Unincorporated	6,478	6,520	6,565	6,555	6,560
Incorporated	1,073	1,080	1,085	1,095	1,100
Republic	1,073	1,080	1,085	1,095	1,100
<b>Franklin</b>	<b>78,163</b>	<b>80,500</b>	<b>82,500</b>	<b>84,800</b>	<b>86,600</b>
Unincorporated	13,491	13,665	13,820	13,160	12,820
Incorporated	64,672	66,835	68,680	71,640	73,780
Connell	4,209	5,150	5,320	5,350	5,330
Kahlotus	193	190	195	195	185
Mesa	489	495	495	495	495
Pasco	59,781	61,000	62,670	65,600	67,770
<b>Garfield</b>	<b>2,266</b>	<b>2,250</b>	<b>2,250</b>	<b>2,250</b>	<b>2,240</b>
Unincorporated	841	835	840	850	845
Incorporated	1,425	1,415	1,410	1,400	1,395
Pomeroy	1,425	1,415	1,410	1,400	1,395
<b>Grant</b>	<b>89,120</b>	<b>90,100</b>	<b>91,000</b>	<b>91,800</b>	<b>92,900</b>
Unincorporated	40,134	40,395	40,790	40,956	41,470
Incorporated	48,986	49,705	50,210	50,844	51,430
Coulee City	562	565	560	570	565
Coulee Dam <i>part</i>	0	0	0	0	0
Electric City	968	1,065	995	1,010	1,010
Ephrata	7,664	7,690	7,750	7,870	7,930
George	501	690	700	720	720
Grand Coulee	988	1,020	1,035	1,045	1,050
Hartline	151	150	150	155	155
Krupp	48	50	50	50	50
Mattawa	4,437	4,460	4,495	4,540	4,460
Moses Lake	20,366	20,640	20,950	21,250	21,600
Quincy	6,750	6,815	6,945	7,000	7,235
Royal City	2,140	2,150	2,160	2,190	2,210
Soap Lake	1,514	1,515	1,520	1,530	1,530
Warden	2,692	2,690	2,695	2,705	2,710
Wilson Creek	205	205	205	209+	205
<b>Grays Harbor</b>	<b>72,797</b>	<b>72,900</b>	<b>73,150</b>	<b>73,200</b>	<b>73,300</b>
Unincorporated	28,438	28,555	28,610	28,615	28,635
Incorporated	44,359	44,345	44,540	44,585	44,665
Aberdeen	16,896	16,870	16,890	16,860	16,850
Cosmopolis	1,649	1,645	1,640	1,650	1,645
Elma	3,107	3,115	3,110	3,115	3,130
Hoquiam	8,726	8,650	8,655	8,620	8,625
McCleary	1,653	1,655	1,655	1,655	1,660
Montesano	3,976	4,010	4,050	4,070	4,075
Oakville	684	685	690	690	690
Ocean Shores	5,569	5,615	5,745	5,815	5,880
Westport	2,099	2,100	2,105	2,110	2,110
<b>Island</b>	<b>78,506</b>	<b>78,800</b>	<b>79,350</b>	<b>79,700</b>	<b>80,000</b>
Unincorporated	53,565	53,700	54,215	54,665	55,090
Incorporated	24,941	25,100	25,135	25,035	24,910
Coupeville	1,831	1,855	1,880	1,890	1,895
Langley	1,035	1,045	1,055	1,065	1,075
Oak Harbor	22,075	22,200	22,200	22,080	21,940



# news·times

VOLUME 75

Oak Harbor and Coupeville, Washington, Thursday, January 26, 1967

NUMBER 19

## Navy Works On Coupeville Strip

The navy conducted flight operations on Coupeville's airstrip January 5 for the first time in several years.

Three A6A Intruders from Heavy Attack Squadron 123 logged 42 "bounces" and established the A6A flight pattern for field carrier landing practice. More work is being done to equip the airstrip for carrier practice "touch and go" landings. The navy expects to have the field in full operations for day and night landings by July 1.

The central Whidbey field, almost completely abandoned by the

navy 3½ years ago, is being activated to ease the crowded traffic pattern at Ault Field brought on by the addition of A6A Intruder squadrons. Intruders and A3B twin jet Skywarriors will use the Coupeville strip for day and night landings.

Navy crews cleaned and checked the Coupeville runways last December. After the runway is painted, the field can accommodate day-time landings by Intruder aircraft.

The larger and heavier Skywar-

riors cannot use the field until arresting gear is installed. This gear should be in place about mid-February.

Installation of runway lights is expected in March to allow night landings. Other equipment for full-time operations should be installed by July. At present, the navy does not plan to base personnel at Coupeville overnight.

The navy stated that 80,000 landings at Coupeville are predicted for fiscal year 1968, with a yearly average after that of about 100,000 landings.



WHIDBEY

# news·times

VOLUME 75

Oak Harbor and Coupeville, Washington, Thursday, August 3, 1967

NUMBER 46

## Coupeville Airstrip Readied For Operations

The Coupeville airstrip is nearly ready for touch and go landings, and these familiarization and carrier landing practices by the navy are expected to begin early this month.

The navy reported last Thursday that it was resealing the joints of the field, and that the strip could

actually be used now at night. Full-time day and night practices are expected in September.

The Coupeville strip is being reactivated by the navy after it was almost completely abandoned several years ago. Opening of the mid-Whidbey field will take a load off Ault Field where the airways

have become crowded.

A majority of the pilots practicing at Coupeville will be flying the A6A Intruder, the navy's all-weather medium attack bomber which has had an impressive record of performance in Vietnam.

All landings at Coupeville will be the touch and go type. The

planes will come down, touch field and then take off.

Pilots will begin their training with familiarization type landings to get used to the approach. Then, they will go to carrier landing practices.

Most familiarization landings are accomplished with an instructor in the plane and radioman on the ground both monitoring the pilot. For carrier practices, the Coupeville strip will have an outline of a carrier deck on the runway and lights that will outline the dimensions of a carrier deck for night landings.

The Coupeville strip will have emergency arresting gear just in case planes are forced to land. It is expected that planes will only land in emergencies.

The field will also have radios at both ends of the runway and an optical landing system indicating the proper glide slope for carrier landings.



# WHIDBEY news·times

AE 76

Oak Harbor and Coupeville, Washington, Thursday September 21, 1967

NUMBER 1

## Coupeville Flights Curtailed

Flight operations until early morning hours by Whidbey Island Naval Air Station jets at the Coupeville field produced some unhappy people in the Coupeville area this past week.

Relief is immediate, however, according to Captain Homer (Ken) Cooley, Commander Fleet Air, Whidbey operations officer. It is anticipated that the Coupeville field will not be used at night for the next two weeks, and thereafter

no later than midnight.

The Coupeville field was recently reactivated to handle increased training requirements for the A6A medium jet attack squadrons and the A3B heavy jet attack-aerial refueler squadrons.

Because several squadron units are preparing to deploy, the number of field carrier landing practice "bounces" at the field and at Ault Field was abnormally high last week.

Referring to the amount of Coupeville air traffic last week, Captain Cooley said, "Most of the time — for most of the year, as a matter of fact — we can accommodate this night training practice at Ault Field. However, at times there is a heavy concentration of flying which must be done just prior to units deploying to aircraft carriers.

"Such was the case last week. Several units are preparing to deploy and the number of flights scheduled was too much to handle at Ault Field; therefore the overload was flown at Coupeville field."

Commander Fleet Air, Whidbey's policy dictates using Coupeville field for night operations only when traffic is so heavy that it cannot be accommodated at Ault Field.

Training operations lasted until morning hours at Coupeville two nights last week, but continued that late five nights at Ault Field.

Captain Cooley added, "You can be sure that flights will end earlier as we go into fall and winter because the increased hours of darkness will enable us to begin flying earlier."

# WHIDBEY NEWS-TIMES

Serving North and Central Whidbey Island

WEDNESDAY, NOVEMBER 4, 1987

VOLUME 96, NUMBER 11

OAK HARBOR, WASHINGTON 98277

35 CENTS PER COPY



Seattle attorney Michael Gendler (at left) addresses the WISE crowd, last week, while (at right) Bill Skubi, WISE publicist and spokesperson, makes some additional points.

## Anti-noise group launches three-prong attack

By Mary Kay Doody  
Staff reporter

They may be new, but they're organized.

From a handful of noise-zone residents meeting in Bruce Bardwell's living room on Morris Road this summer, Whidbey Islanders for a Sound Environment (WISE) has grown into a tax-exempt nonprofit corporation with about 100 dues-paying members and a mailing list of more than 300 households.

WISE has launched an aggressive membership drive and a campaign for contributions to pay for litigation against the Navy — the legal prong of the group's three-pronged effort to "restore liveability" on Central Whidbey, where Navy jet operations have increased 250 percent over the past two years.

More than 400 people attended a WISE meeting last Tuesday, when plans for legal and other action were discussed.

"You are one of the best-organized groups I've seen," Seattle attorney Michael W. Gendler told the crowd gathered in the Coupeville High School gym. "The one thing you do have going for you is numbers."

Gendler, who has fought expansion of Pease Field and litigated other noise cases, said action forcing preparation

of an environmental impact statement on the Navy's Air Installation Compatible Use Zones (AICUZ) could be taken under the National Environmental Protection Act (NEPA).

Invited by Coupeville attorney Ken Pickard to address the WISE meeting, Gendler also discussed possible inverse condemnation litigation claiming devaluation of residential property by jet noise.

WISE should expect litigation to cost anywhere between \$5,000 and \$30,000, he said.

The group has not yet retained a lawyer, but WISE legal committee chairman Will Jones said he recommends "moving right out" with a legal action plan, and hiring a lawyer before the end of November.

With the help of volunteers, legal research would be completed by the end of December and a lawsuit filed by the end of February, if the group acts according to Jones' 130-day plan of action.

Jones said the three prongs of the WISE's approach are direct negotiations with the Navy, political action and litigation.

Jones said the government might "recognize the problem and start doing something about it" when WISE gets "all three of those approaches going in parallel."

Tom Punch, WISE's Navy liaison committee chairman, said direct negotiations were "going at a snail's pace" but that he thought they could be productive. Punch, a Coupeville Realtor, asked noise zone residents to let him know how many flights per day they "can live with" for purposes of negotiating.

Political action committee chairman Dennis Argent said the state's congressional delegation reported receiving "stacks of letters," and he urged members to keep writing their elected representatives.

If direct negotiation and political action aren't enough, said Jones, a \$100-million lawsuit "might get the attention of the government." He said his rough estimate was based on an average \$25,000 loss of property use, due to jet noise and accident potential, on some 4,000 lots in and around the Navy's Coupeville Outlying Field (OLF).

To save on legal fees, Jones said, volunteer members of his committee could do much of the research on such things as the number of properties adversely affected, and how their owners use them.

Jones is a member of the Coupeville Town Council, which in April unanimously adopted a resolution against Navy noise and accident-

potential zones in town. NAS Whidbey commanding officer Capt. Dave Williams wrote the town in July saying the Navy can't comply with the resolution, and urging town officials to cooperate in AICUZ planning efforts.

Under the WISE plan, even as litigation would proceed, said Jones, attempts to "establish a dialogue with the Navy" for direct negotiations would continue, and pressure would continue to be put on local, state and federal elected officials to help solve the problem.

The problem WISE cites is that operations have increased drastically and are expected to continue to increase at the Coupeville OLF, and residents of some areas — such as Admiral's Cove — are regularly subjected to average noise levels of 75 to 85 or higher.

Ldn is a measure of the day-night average sound level in decibels, with night-time noise weighted an extra 10 decibels because of its greater intrusiveness.

In its Air Installation Compatible Use Study (AICUZ), the Navy uses 65 Ldn as the lower "threshold of adverse noise effects."

Gendler said the scale is logarithmic, so that 75 Ldn, for example, is 10 times noisier than 65 Ldn — and 85 Ldn

(Please turn to page 2)

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VOLUME 96, NUMBER 11

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## Anti-noise group launches three prong attack

(Continued from page 1)

100 times noisier than 65 Ldn. Advising the WISE group that a NEPA suit could force the Navy to do an environmental impact statement on its AICUZ plan, which covers developed as well as undeveloped areas, Gendler said studies have shown that noise levels above Ldn 65 can cause hearing loss, and that it's cumulative.

"Every time these planes fly over, you are losing a little bit of your hearing that you're not going to get back," said Gendler, adding that noise levels capable of causing hearing loss can also cause irritation, sleep interruption, nervous disorders and "even mental illness."

He advised people to keep records of unusual events — such as when planes fly out of their prescribed patterns, or dump fuel. Phoning in complaints to NAS Whidbey shouldn't be looked at as futile, but as important documentation, he said.

Gendler even recommended noise zone residents tape record the jets' noise for possible demonstration for a jury if a lawsuit should go to trial. A recording of conversation being drowned by the roar of jets is more dramatic than statements to that effect, he said.

Because continued use of OLF is essential to NAS Whidbey's mission, Navy officials say, the county and cities of Coupeville and Oak Harbor should change the zoning of residential land under the flight patterns for more compatible uses such as agriculture, forest management or mining.

That "down-zoning," Gendler said, "is the Navy's way of shifting the costs of their noise from them to you."

WISE members have said that some people in the noise zone want to move because they can't stand the noise from the stepped-up operations at OLF, but that it's hard to find buyers because of the noise.

But WISE president Bruce Bardwell told the group last week that he finally sold his house in the noise zone, on Morris Road, to a couple from New Jersey — and that he's made an offer on property in Race Lagoon.

Bardwell said he knows Race Lagoon is also in a noise zone but that he was confident that WISE, county government and the Navy would somehow resolve the conflict between residential development and the Navy's use of the OLF property.

"We're going to get this thing worked out so that all of us will have a liveable environment," said Bardwell.

In an information sheet distributed by WISE, the group asks people to "think beyond the noise problem to the issue of public health and safety. Remember, six NAS Whidbey A-6 aircraft have crashed in the last 12 months."

None of those tragedies, involving A-6 Intruder attack bombers occurred on the island, but in December 1982 an EA-6B Prowler — a tactical electronics-jamming aircraft — crashed in the woods near Coupeville OLF, killing its crew of two naval officers. No one else was hurt.

Navy officials have stressed the importance of keeping residential development from encroaching into accident-potential zones and have not ruled out the possibility of buying development rights, but no such compensation has been reported budgeted.

Other measures the Navy seeks are requirements for noise attenuation in construction, and for full disclosure of noise levels and accident-potential ratings to prospective land purchasers.

WISE says those measures are too little too late in already-developed areas.

In Admiral's Cove, for example, there are about 150 houses, said neighborhood resource committee chairmen Forrest and Ann Davis. Mr. Davis has volunteered the use of his home computer for WISE research and newsletter production, and Mrs. Davis has organized a team of volunteers who are canvassing neighborhoods drumming up members and supporters.

After last Tuesday's meeting was adjourned, knots of spectators watched a videotape of a documentary on a similar conflict near NAS Fallon in Nevada that was aired this summer.

"The same thing went on there," said Mary Argent, who taped the show. "The residents protesting the noise were called anti-Navy and un-American."

Then-commanding officer of NAS Fallon Capt. Dick Toft was interviewed along with several residents of Dixie Valley, where litigation over jet noise, including sonic booms, ended with the Navy paying to relocate several families.

Toft, who is now Rear Admiral Fred Metz's chief of staff for the Pacific Air Wing, attended last week's WISE meeting, but didn't address the group.

WISE vice-president Jim Burns said Toft introduced himself and they had a brief conversation after the meeting.

# County supported Navy during '87 controversy

By Jim Thomsen  
Staff reporter

Nearly five years ago, supporters of the Navy and opponents of Navy aircraft noise had a showdown before the Island County Board of Commissioners.

Pressed to take a stand, commissioners Dick Caldwell, Dwain Colby and Gordon Koetje — the same who will preside at a public hearing Monday on the issue — lent their unanimous,

though somewhat reluctant, support for the Navy.

The Navy was looking at siting new attack squadrons at one of their west coast naval air stations — either on Whidbey Island or at Lemoore, Calif.

The Navy's decision hinged, in part, on the support of the local community for such an expansion here.

A vital part of that support was an on-the-record, unanimous endorsement of continued operation of the Navy's carrier-

landing field at Coupeville by the county commissioners.

Base supporters and aircraft noise opponents, including the then-newly formed Whidbey Islanders For A Sound Environment, prepared high-profile campaigns aimed at the commissioners' endorsement.

While Caldwell and Koetje had indicated they were inclined to support the Navy, Colby was leaning the other way.

Colby had written a confiden-

tial memo to former NAS Whidbey Cmdr. Dave Williams earlier. In the memo, Colby proposed the county ban new residential development around Ault Field in exchange for Navy abandonment of OLF Coupeville.

Pressed for his views during the public hearing, however, Colby said: "I don't think there's any question but that we all do (support the Navy)."

Williams and other Navy officials pledged to continue study-

ing feasible alternatives to OLF Coupeville and implemented Air Installation Compatible Use Zoning (AICUZ) guidelines.

WISE attorney Ken Pickard later said his group was contemplating a conflict-of-interest lawsuit against Koetje because he owns land in the disputed zones. No action was ever filed.

NAS Whidbey received the new squadrons, and the number of flights within the noise zones more than doubled from 13,000 annually to more than 30,000.

## WISE testifies in San Francisco; suggests skepticism in numbers

By CRAIG DENNIS  
*Publisher*

SAN FRANCISCO - James Burns, president of Whidbey Islanders for a Sound Environment (WISE), told the Base Closure and Realignment Commission to review with skepticism numbers supplied in support of keeping NAS Whidbey open.

Burns was speaking for his organization as well as three other regional environmental groups concerned with noise encroachment in north Puget Sound.

WISE was allotted five minutes by the local task force midway through their 75-minute presentation.

"I'm not terribly happy to be sitting here in the camp of the enemy," said Burns. "Our group is not opposed to the Navy on the island."

But he said his group believes the Navy has not done an adequate job of addressing their environmental concerns.

Burns told the commission about last week's WISE membership vote in favor of the Navy's decision to close NAS Whidbey.

"We are not against the

Navy," he said. "We are for solving some problems."

He said his group believes NAS Whidbey is too small for adequate training operations. In support, he cited that NAS Whidbey has approximately 5,000 acres compared to 18,000 owned by the Navy at LeMoore, Calif., the proposed receiving base for the A-6 and EA-6B communities.

**EDITOR'S NOTE:** Craig Dennis, publisher of the Whidbey News-Times, is a member of the Save NAS Whidbey Task Force. He prepared the reports from San Francisco.



Appendix E-7



**APPENDIX F: 2016-06-25 E-MAIL FROM CAPTAIN GEOFFREY MOORE, USN**

**From:** Moore, Geoffrey C CAPT CO NAS Whidbey Is, N00  
**To:** [Helen.PriceJohnson](#)  
**Subject:** RE: this is madness -  
**Date:** Saturday, June 25, 2016 8:40:21 AM  
**Attachments:** [smime.p7s](#)

---

Commissioner Johnson,

It's been a busy week prepping for our open house and we are fighting a stomach bug in our family, so apologize for the delay in my response. Finally, in the calm before the open house starts, I have an opportunity to address correspondence.

Mayor Hughes discussed this farm with me as well, and I have listened to [REDACTED] comments to the Island Board of Health. I review our noise complaints daily so I can understand the impact on our local communities, so I appreciate you forwarding this e-mail.

As mentioned at our Tuesday discussion, there was acknowledgement that our nighttime FCLP requirements would most likely cause sleep disturbance of residents around OLF Coupeville. Coinciding schedules of two carriers has forced us to use both Ault Field at NAS Whidbey and OLF Coupeville this last week to get our pilots the necessary training prior to conducting at sea operations. Meeting the requirements of two squadrons did not allow us to alternate between the fields each night to provide some relief to the citizens who live near each respective airport. The timing with Summer Solstice was truly unfortunate. We have additional operations next week, but currently only plan one night at OLF Coupeville and four nights at Ault Field. The night operations at OLF Coupeville should be complete by midnight.

I discussed the downwind altitude with my operations officer after our discussion on Tuesday, and confirmed that the daytime altitude of 800 feet and the nighttime altitude of 1,200 feet has not changed in as far back as they have been stationed at NAS Whidbey Island. These altitudes are the same ones that we fly at the carrier, and with the precision requirements of that difficult task, the best training is achieved when we can duplicate the sight picture of the same altitude as the carrier pattern.

As of this morning, we have flown 3,906 operations of our NEPA allowance of 6,120 operations. That translates into 56 hours and 7 minutes total flight time at OLF Coupeville since January 1st; 5 hours and 14 minutes of that total has been flown between 10 p.m. and midnight. (~four hours this last week, and a little over an hour in May.) We continue to closely monitor our utilization of OLF Coupeville, and I look forward to working with you, the Island County Commissioners, and other elected leaders in our local area to be able to meet our local training requirements with the least impact possible to our surrounding areas.

Once again, thank you for the meeting invitation last week as well as the continued dialog.

Sincerely,

CAPT Geoff 'Jefe' Moore  
Commanding Officer, NAS Whidbey  
Island Geoffrey.Moore@navy.mil  
Office Phone: 360.257.2037

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-----Original Message-----

From: Helen Price Johnson [mailto:H.Price\_Johnson@co.island.wa.us]

Sent: Wednesday, June 22, 2016 5:03 PM

To: Moore, Geoffrey C CAPT CO NAS Whidbey Is, N00

Cc: Pam Dill

Subject: [Non-DoD Source] FW: this is madness -

Capt. Moore, I appreciated your presence and presentation at today's COG meeting and our conversation yesterday. Below is a common message from one of the Central Whidbey farmers. We spoke yesterday about the difference when pilots are lower and how it intensifies the impact for those beneath the flight path. You said there is a standard range, and I ask if there is any way the pilots can pull up a bit higher in that range as they circle over the workers there, it would be greatly appreciated.

Thanks,

Helen Price Johnson  
 Island County Commissioner, District 1  
 District1@co.island.wa.us <mailto:District1@co.island.wa.us>  
 PO Box 5000  
 Coupeville, WA 98239  
 (360)679-7354 office  
 (360)632-1168 mobile  
 "Quality services for a quality life"

From: [REDACTED]  
 Sent: Wednesday, June 22, 2016 4:27 PM  
 To: zz district1 <district1@co.island.wa.us>  
 Subject: this is madness -

Dear Helen

This is complete madness. The planes are coming in so low and are so loud. Flew till Midnight last night and are supposed to again tonight and tomorrow. Right now they are just above the barn and trees- barely. You have no idea the effect. We got about 4 hours of sleep last night. Earplugs on in my bed and still too loud. This is NOT okay. My windows are rattling and it is difficult to work. Something must be done. Really different than at OLF as the acceleration and after-burners multiply the effect.

Is the board of health going to do anything? The commissioners? I really wish you and the health commissioners could come hear this first hand. You would get our distress.

I'm sure you are tired of hearing from me but our lives are a living hell. They passed over every 20 seconds last night for over 2 hours. More expected. It has to stop. What can we do?

Sincerely,

[REDACTED]  
 [REDACTED]  
 Coupeville, WA 98239  
 [REDACTED]

## APPENDIX G: COER WANTS TO GET RID OF NASWI

Captain Geoffrey Moore, CO NAS Whidbey Island, "Why would it be in my interest to talk to someone who wants to get rid of me?"  
(21 April 2016 [Whidbey News-Times](#), "The man in charge: Moore settles in as base commander")

Captain Moore, you're right. Here's almost if not two pages of *why* so strike back with Scenario A and kick the COER *enemy* out of ~~Kuwait~~ OLF:

**From:** [REDACTED]

**To:** Helen Price Johnson;Jill Johnson;mayor@townofcoupeville.org; justin burnett;Murray, Sheila A CIV NavyRegion NW, N00P;Congressman Rick Larsen;Marilyn Clay

**Subject:** More thoughts from Slovenia

**Date:** Wednesday, May 15, 2013 11:30:41 PM

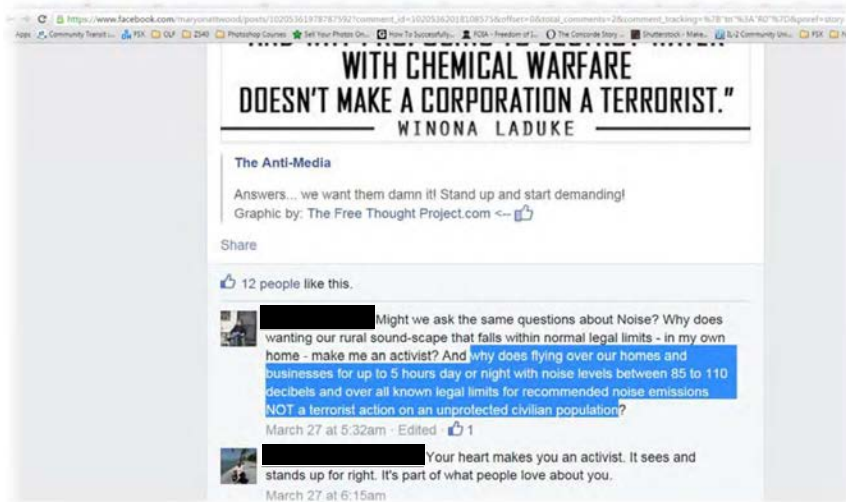
Oh, I forgot about the hundreds of homes and thousands living in APZ1, I.e. Crash zone 1. The collusion of local government with the Feds and military is sinful. Don't make crash zones at OLF, too many people will complain, God, we might lose the oozing of pork grease at NASWI on paydays twice a month, just let people build and try to live in what would have been the crash zones. Way too late for APZs now. And Island County's fraud in taking a fourteen million dollar grant to build the bus barn in what would be APZ1. I'm sure the agency, had they known, would not have granted the money, pork,pork, to build in a crash zone. Maybe they should be notified so they can recover that money back from the County. [REDACTED]

[Garrett Newkirk](#)

No the military is not being a good neighbor.the military is a guest and this guest is wearing out its welcomeby thier actions.[Reply](#) · [Like](#) · 15 hours ago

[REDACTED]

· Top Commenter · [Coupeville, Washington](#) The Navy is not even trying despite their rhetoric. They want to train in the darkness so they pick the shortest days of the year in northern latitudes to train. What insensitivity, or are they really that stupid? Train in the winter when it gets dark at 4:30 p.m. and they can do all of their flying at NASWI. They are the biggest bully in the world. [Reply](#) · [Like](#) · [Follow Post](#)



STOP DESTROYING COUPEVILLE. ... we heard the same hollow words during vietnam "that we had to destroy it so we could protect it's freedoms" .. this jewel of the NW geography and historical seaport heritage are being destroyed by the same mindless decision makers. Thousands of my community members have devoted years of environmental good stewardship, celebration and preservation of a unique territorial seaport/ farming community. YOU DESTROY any peace and solitude that my community works hard to achieve. YOU are the ... ""HELL FROM THE HEAVENS ABOVE".... YOU poison the environment physically, economically and socially. GO TO LEMORE. .. GO SOMEPLACE WHERE YOU ARE NOT PHYSICALLY THREATENJNG THE CIVILIANS ON **THE** GROUND. This is an island with limited resources, YOU *have* far exceeded those resources ....Harry Toulgoat, Coupeville, WA

It is time for you "representatives" to get some balls and take the death machine on on this issue, quit licking their jackboots! Buck up! You know it is wrong for them ilitary to abuse us with this toxic noise that is ruining our lives and property values, so act in accordance with what you know to be true instead of like worried, timid leaders, afraid of the military, afraid of losing the federal pork it delivers hereon pay days. Get some courage, let the people be heard. Sitting at a table "talking" is not going to solve anything.

██████████

APPENDIX H: AVGEEKJOE PRODUCTIONS FACEBOOK AD REQUESTING PRO-OLF COMMENTS

The screenshot shows a Facebook post from AvgeekJoe Productions, dated November 18 at 11:12pm. The post text asks for support for Naval Outlying Field Coupeville and requests a pro-OLF comment to a specific URL. The post includes a video of an EA-18G Growler aircraft. Below the video is a link to an environmental impact statement for the EA-18G Growler Airfield Operations, with a note that all written comments must be postmarked or received online by January 25. The post has 6,401 people reached, 178 reactions, comments, and shares, and 500 post clicks. The engagement statistics are as follows:

6,401 People Reached		
178 Reactions, Comments & Shares		
89 Like	57 On Post	32 On Shares
2 Love	2 On Post	0 On Shares
1 Wow	0 On Post	1 On Shares
45 Comments	41 On Post	4 On Shares
41 Shares	40 On Post	1 On Shares

Post Clicks: 500 (0 Photo Views, 394 Link Clicks, 106 Other Clicks). Negative Feedback: 2 Hide Post, 0 Hide All Posts, 0 Report as Spam, 0 Unlike Page. The post is liked by Heidi Gibson, Brad Frost, and 57 others, with 20 comments and 40 shares. The Windows taskbar at the bottom shows the time as 12:27 PM on Saturday, 12/3/2016.

\*Other Clicks being clicks on the title or the weblink in the post.

Now, US Navy, you are welcome. Now PLEASE use the AFTERBURNERS if you would so kindly PLEASE use the AFTERBURNERS PLEASE.

1.a. Thank You

2.m. Record of Decision/Preferred Alternative

Sedro Woolley, WA 98284

Just a real short comment asking you guys do all you can for Scenario A. We need to use that OLF for FCLP and not political patty-cake for folks who will never give presents to Navy pilots, folks who show up at Navy open houses to BASH the Navy, and folks who think the Cultral Resources Officer's only purpose in life is to wipe their tears over some "adverse impact". Please... do what you gotta do for Scenario A. It's so bad we've having VAQ-129 students get FCLP at Ault Field and in the DES-ERT on THANKSGIVING WEEK to appease COER. THIS IS NOT AN ACCEPTABLE OUTCOME. Frankly if you choose to live next to OLF, you get jet noise. Those lucky sods better enjoy sexy afterburner because we better get LOTS of afterburner after we retake the OLF. GO NAVY, BEAT COER, DON'T GIVE UP THE OLF!

Sedro Woolley, WA 98284

1.a. Thank You

8.e. Outlying Landing Field Coupeville and Coupeville History

On this Christmas Eve 2016, I wish for a bus stop in my name at OLF and a quick hike to see Growlers bounce at OLF in afterburner, on a regular basis. I also want at the least a damn good explanation of the history of OLF in the context of Whidbey Island so this NONSENSE of placing Ebey's NHR ahead of OLF is exposed for who and what it truly is. I have nothing against Ebey's NHR until such time as Ebey's NHR and its members turn on OLF Coupeville. If there was realistically another bounce field for NAS Whidbey Island, I might sing a different tune. As I've mentioned in other comments, I appreciate the Navy taking the time to explain why OLF is so irreplaceable. You have given all defenders of OLF moral CLARITY.



Sedro Woolley, WA 98284

OK, since COER is flooding this box, I will as well... this time on NALF Fentress. Why? Because I think it would be helpful considering the EA-18G Growler and the F/A-18E + F/A-18F Super Hornet use the same jet engine which is the source of almost all of a jet aircraft's noise to do some comparative work. Just to put things in perspective since both NALF Fentress and OLF do the same task - provide safe Field Carrier Landing Practice and have many eerie similarities. 1) How many operations at NALF Fentress a year from F/A-18Es & F/A-18Fs? 2) How many health claims against the US Navy since say 2008 from NALF Fentress from jet noise and water pollution? I'm sure the answers will be in OLF's favor. But I'm the afterburner extremist, so you tell me.

1.a. Thank You

4.r. Nonauditory Health Effects

5.b. Overtasking/Overloading of Air Traffic Control at Ault Field and Elsewhere

## 1.a. Thank You

Sedro Woolley, WA 98284

Yeah, just got COER's latest crybaby e-mail. I'm an "Abused Citizen of the USA" because COER kept me from seeing my crush do Field Carrier Landing Practice in full afterburning glory. Yeah, I'm an "Abused Citizen of the USA" because I'm NOT a consulting party to the concrete barriers but COER is - yes, the same people that have Maryon Attwood equate Field Carrier Landing Practice to a "terrorist action" on her Facebook page. I'm an "Abused Citizen of the USA" because COER whines about Growlers using afterburner, which bring me such joy as an afterburner extremist. . Oh and... to be an American to me means SHARING IN THE SACRIFICE. Our grandparents' generation must be rolling in the grave that we are not allowed to do more to fight this seditious Fifth Column in our midst. ISIS is a real threat - see [https://en.wikipedia.org/wiki/List\\_of\\_terrorist\\_incidents\\_linked\\_to\\_ISIL](https://en.wikipedia.org/wiki/List_of_terrorist_incidents_linked_to_ISIL) . al Qaeda is a real threat - remember 11 September 2001? The People's Republic of China and the Russian Federation are not exactly drinking buddies... yet with the USofA. . So COER, you like the fact I hacked your tag? You're Americans-In-Name-Only - you want all the rights, none of the responsibility. Scenario A will be a stunning VICTORY for Americans who built OLF in World War II and reinstated it in 1/1968 to defend Americans in Sedro-Woolley, Sarasota and all places in between.

# Response to Draft EIS for EA-18G "Growler" Airfield Operations at NAS Whidbey Island



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## DEDICATION

This sortie is for Lt. Cmdr. Nate Barton, USN and his family. Everything to get NAS Whidbey Island's first Blue Angel jet pilot home to his bride and kids. It's why I'm calling this OPERATION NATE STORM. The "Nate" is for him, who also was a Landing Signal Officer at OLF. The "Storm" is well, it's been confrontational with these COERs and it will be so again.

I want my fellow OLFers and I who got hooked on naval aviation watching the Blue Angels to *give back* to Naval Aviation. American citizens like I get to have freedom and awesome parents because the Armed Forces got our backs – and I can't think of a higher honor as an American than to get the backs of our Navy.

I add the penultimate honor I have as an American is being a "Fat Albert" passenger. 31 July 2015. This mission is also for getting to pull at least 2 if not 3 positive G and at least a bit of terrifying negative G over Seattle & Lake Washington with my pilot Major Dusty Cook, my copilot Major Mark Hamilton and observer Captain Katie Ann Higgins Cook. I carry my Bert Coin in my wallet at all times, ready to yank out as appropriate and necessary – like, I don't know, when I'm downrange in The Belly of The Beast called the Island County Commissioners' Chamber and the COER are all around. Never lost a community confrontation and kept my honor clean with that coin in my hand – especially when I had to "fly" four sorties downrange to the Island County Board of Health to hold the line against COER. Long deployments of at least three hours ingress and three-four hours out on public transportation; but at least the COER got no traction. I just hope my Bert Crew is proud of their Bert Passenger – those sorties *and especially this one* is for them and what the Fat Albert program stands for: Spread the troops word and support our frontline troops.



Figure 1: [REDACTED] Fat Albert Coin



Figure 2: My photo from my Whidbey Daily assignment aboard "Fat Albert"

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## INTRODUCTORY THOUGHTS

I want to begin by stating I believe this Draft EIS comment period may just be the last realistic public comment on OLF for the next 20-30 years. Or possibly more, until the EA-18G Growler replacement matures. As such, writing this response is a serious and through undertaking on my part to conclude several years of defending OLF Coupeville, up to and requesting an EIS in a petition I initiated whose cover sheet is Appendix A. Please understand that I understand you, the United States Navy, are required by law to respond to each and every comment to this Draft EIS. I know my friends in America's VAQ Wing are counting on ME to clear the road to keep OLF open and expand its use to an appropriate level. To that end, regardless of how many Growlers you get in the end from Congress, I endorse Scenario A – maximize OLF use.



Figure 3: [REDACTED] Photo of OLF Flight Ops

You may have noticed I use the term OLF – as OLF is short for Outlying Field. A section of my comments will address why I believe OLF needs a name change. I have arrived at the view that the Town of Coupeville may just welcome a name change request and obviously I'm of the view OLF needs to be vigorously defended – up to and including some new branding.

If this EIS process is going to be the last word and there is no successful appeal, then you have a moral obligation to err on the side of "ideal training" over "noise impacts" to a smaller community that *consciously* choose to encroach on OLF in the name of using OLF as OLF, "more closely replicates the pattern and conditions at sea and therefore provides superior training" (Page ES-3). I'm not denying noise impacts at OLF, and clearly the National Park Service is to be commended for doing an actual noise study in Ebey's NHR – doing the work the Navy was requested to do and – albeit very politely – refused the community request.

## WHY OLF?

### Thank You for Responding to Petition to Explain Why OLF

I am very happy with pages 2-18 & 2-19 under "Regional civilian airfields" and "Construct a new OLF" that you resolved why replacing OLF... won't fly and before that pages 2-15 to 2-17 why the Growlers get to stay at NAS Whidbey Island. I want to mention again Appendix A which is the cover sheet to a petition with 1,626 signatures that required an Environmental Impact Statement (EIS) that requested, "Why America's OLF is so vital to the national defense" and, "What exactly an alternative OLF would cost at say preferably Skagit Regional Airport (KBVS), or possibly Quillayute Airport (KUUL), the Yakima Firing Range, or Hanford Nuclear Reservation versus eminent domain around OLF Coupeville (KNRA)."

Considering the 2013 COER petition never mentioned an Environmental Impact Statement at <http://petitions.moveon.org/sign/citizens-group-to-take> filled with spam signatures and considering the COER 2013 litigation complaint only requested, "the required environmental review of its flight operations at OLF," without any parameters I think it's safe to say you are responding to the petition I quarterbacked and exposing some ground truths. You see, the folks that support our troops also wanted resolved for the public record these

<sup>0</sup> One can read the Ebey's NHR study at <https://goo.gl/sGOkG7>.

issues of community concern. You resolved those issues, especially very clearly in Appendix H. We asked, you listened, you pithily responded in depth, I thank you.

### As Captain Moore, USN Explains...

In a recent public records request of Island County Health Department, this 14 July 2016 e-mail from NAS Whidbey Island CO Captain Geoffrey Moore, USN to Island County Commissioner Helen Price-Johnson I think said the best why OLF Coupeville as per Appendix B:

The crews cover altitude adherence in every brief before every OLF Coupeville flight--not only because of the requirement to adhere to our air operations manual, but because it is important to be on altitude and airspeed when a pilot commences their 180 degree descending profile to landing. Any failure to be on altitude--high or low--will most often result in a poor landing pass. I liken it to a boat's approach to a pier--if you start your transition with too much speed, the work load is significantly higher as you have to decelerate more than normal, therefore increasing the odds of overrunning the pier or hitting it with higher than desirable speed.

It's the same thing in the aircraft, only with speed, altitude, and maintaining an optimal abeam distance from the runway. As we develop muscle memory for the approach, it is a disadvantage to be high or low, fast or slow from the ideal starting point when one commences their landing approach; in this situation the pilot will have to work harder to get the aircraft back on parameters as they make the approach which will more likely than not result in a less than optimal landing or waveoff. Another way to look at it--not being on altitude or airspeed or at proper distance from the runway is like a professional batter not being ready to swing when the pitcher commences their windup--they will most likely never catch up.



Figure 4: 6 January 2014 FCLP at OLF

Failure to hit their parameters when flying our Field Carrier Landing Practice approaches at Ault Field or OLF Coupeville will only be more pronounced when a pilot makes their approach to the moving flight deck on the carrier--this is why our Landing Signal Officers constantly emphasize this as they review each pass

I republish this e-mail as a) I think it should be damn clear the *raison d'être* of OLF and b) To make damn sure this e-mail is in the official record just-in-case COER appeals.

### Quoting Declarations Received to Stop Injunction Attempt

Considering that Captain Moore's naval aviation experience has been with helicopter squadrons, I wanted to slide in Captain Benjamin Hewlett, USN's declaration into this testimony (See Appendix C) to rebut a 2015 attempt to close OLF Coupeville via an injunction:

I was designated a Naval Aviator following completion of advanced aviator training in January 1995. Over the past 20 years, I have served as an operational aviator and a flight instructor, including duty as a Carrier Air Wing Landing Signals Officer, where I was responsible for the safe and expeditious recovery of all aircraft aboard the aircraft carrier. ... I have personally flown the EA-18G "Growler" on numerous occasions, and I have flown out of NAS Whidbey Island and practiced FCLPs at Outlying Landing Field ("OLF") 10 Coupeville. I have 760 carrier-arrested landings. ... The dynamic and high risk nature of night carrier operations requires very strict night Field Carrier Landing Practice (FCLP) periodicities for aircrew proficiency prior to embarking the ship for any at sea period in order to ensure an acceptable level of risk is maintained. Carrier landings are a perishable skill, and Navy policy mandates that FCLP training should be conducted within five days of landing on the aircraft carrier and must in no case be conducted more than 10 days prior to landing on the carrier. Having conducted FCLPs at OLF Coupeville, I believe OLF Coupeville provides a realistic environment in which to practice FCLPs. Any degradation of the ability for VAQ-137 to conduct FCLPs in an environment as ideal as OLF Coupeville prior to embarking aboard ship will degrade U.S. and coalition combat effectiveness while creating unacceptable risks for the aviators and crewmembers aboard TR [TR = USS *Theodore Roosevelt*].



Figure 5: VAQ-137 Rooks Using OLF in 9/2014

Let me also quote the immediate former CO of NAS Whidbey Island Captain Mike Nortier, USN as well who wrote the judiciary and whose declaration is Appendix D:

I was in command of NAS Whidbey Island on June 28, 2013 when U.S. Fleet Forces halted flight operations at OLF Coupeville, and when FCLPs at OLF Coupeville resumed in January 2014. Ault Field was utilized to meet most of the remaining FCLP training requirements for that year. The suspension of flight operations at OLF Coupeville created operational impacts that were not sustainable, either as a permanent solution or as a temporary solution extending much longer than what was experienced in 2013.

...

During November of 2013, as several squadrons conducted FCLPs in preparation for deploying on aircraft carriers, other aircraft awaiting departures and arrivals encountered extensive delays, in some cases greater than 45 minutes. The back-up of aircraft waiting to take off or land accumulates when closed-pattern FCLPs are conducted at Ault Field. Because FCLPs are so closely sequenced, non-FCLP aircraft must hold on the taxiway to await a gap in flying to safely depart. Backups on the airport taxiways due to FCLPs lead to missed training windows in military operations areas (MOAs) and military training routes (MTRs), which are tightly scheduled to meet the requirements of 20 squadrons assigned to NAS Whidbey Island. In order to relieve the congestion on the ground in 2013, the air traffic controllers had to create space between airborne FCLP aircraft-to create an opening in what is normally a closed pattern-so that other aircraft could take off or land. This lengthened the FCLP pattern so that aircraft flew outside the standard FCLP patterns. This has a detrimental impact on FCLP training, because the pattern being flown no longer closely resembles the pattern flown at sea. It also means that FCLP aircraft fly over different locations in the community than under a standard pattern, which tends to give rise to additional noise complaints.

I know Captain Nortier personally and I know Captain Nortier is a man of professional honor. If Captain Nortier claimed, "operational impacts that were not sustainable" then much deference should be given to the warfighters defending these United States of America.



## OLF IS NOT NEW, NOR ARE NOISE COMPLAINTS

In the past year, as able, yours truly has been browsing the Whidbey News-Times on the Oak Harbor Library microfiche archives. I register disappointment at the lack of historical documentation and discussion about OLF in your report. Being you will receive quite a few pro-OLF comments and this response is heavily biased as being from a self-identified afterburner extremist, I'm going to select a small handful of newspaper articles.

### 1967 Reactivation of OLF

For instance, in 1967 alone, the 26 January 1967 Whidbey News-Times reported OLF on 5 January 1967 had three Grumman A-6A Intruders show up and bounce, initiating jet usage of the OLF (See Appendix E-1). The 3 August 1967 Whidbey News-Times (See Appendix) went on to report full training ops would begin in September and then laid out the operations of OLF in 1967 which appear to mirror the case today (See Appendix E-2). However, the 21 September 1967 Whidbey News-Times in an article titled, "Coupeville Flights Curtailed", "Flight operations until early morning hours by Whidbey Island Naval Air Station jets at the Coupeville field produced some unhappy people in the Coupeville area this past week. ... The Coupeville field was recently reactivated to handle increased training requirements for the A6A medium jet attack squadrons and the A3B heavy jet attack-aerial refueler squadrons" (See Appendix E-3).

### 1987 Rise of WISE

In 1987, a group called Whidbey Islanders for a Sound Environment or WISE formed. According to the 4 November 1987 Whidbey News-Times (See Appendix E-4), Ken Pickard (now of COER) was an attorney. The group wanted to enter into a dialogue with the Navy while also considering litigation and pressure upon politicians. In a 9 May 1992 Whidbey News-Times article titled, "County supporting Navy during '87 controversy" and as Appendix E-5 reminiscing about 1987, the article mentions pressure applied upon the Island County Commissioners and, "**WISE attorney Ken Pickard** later said his group was contemplating a conflict-of-interest lawsuit against Koetje because he owns land in the disputed zones. No action was ever filed."

### 1991 BRAC Attempt

In the heady days of the spring of 1991, Whidbey Islanders for a Sound Environment or WISE even went so far as to testify to the Base Closure and Realignment Commission (BRAC) that according to the 8 May 1991 Whidbey News-Times, about the "WISE membership vote in favor of the Navy's decision to close NAS Whidbey." Like a certain COER now, WISE claimed, "We are not against the Navy. We are for solving some problems." (See Appendix E-6). Now you know why local supporters of NAS Whidbey Island get real cynical when we hear from noise complainers like COER, "We are not against the Navy".

## DAYS OF OLF USE?

*Moving along*, I noticed that your displays at the Draft EIS Public Meetings make a reference to # of days OLF is being used currently, but you do not have in the Draft EIS how many days each scenario will be using OLF. Below is a crop on the display "Airfield Operations":



Figure 6: Airfield Operations Graphic at EA-18G Draft EIS Open Houses

It would be interesting what the pie charts would be under Scenarios A, B & C. Also helpful to show, "OK Scenario A entails this many OLF days versus 'no action' just so you know".

### THANKS FOR NOT SPLITTING THE VAQ WING UP

I agree with your comments from pages 2-13 to 2-19. I think the costs of doing what COER and other such noise agitation groups want (e.g. build OLF replacement, split up the VAQ Wing) far outweigh the costs of any successful future inverse condemnation or eminent domain suit noise agitation groups may bring against the US Government.

As to your specific comments on page 2-18 regarding "Detachment training out of the region", I got to cover for AIR International the homecoming of the VAQ-139 Cougars in the spring of 2015. One of the aircrew, who shall remain anonymous as he wasn't being interviewed to respond to your Draft EIS, told me straight up having to go to NAF El Centro would mean 2-3 weeks away from family before a historic 10 month *deployment*.

I'm happy the US Navy Department is seeking to prioritize military families over *jerks* who consciously choose to live next to a Naval Outlying Field and then complain about the noise. Oh and then claim health hazard but never request eminent domain or inverse condemnation.

### A Note From the Scoping Period

I noted back on 10 October 2014 when you issued in the National Register a, "Revised Notice of Intent To Prepare an Environmental Impact Statement for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island, WA and Notice of Request for Public Scoping Comments" at <https://goo.gl/oC1Agi>, you said very publicly in part, "The DoN is not considering alternative locations for FCLP training, or squadron relocation." If Citizens of the Ebey's Reserve (COER) had a problem with this, well then you have to ask yourself why did COER not appeal demanding a course correction?

It's blatantly obvious to me COER has questionable standing at best to impugn this EIS as a result. Especially as the group that initiated this EIS process in its litigatory complaint requested only, "The required environmental review of its flight operations at OLF" with no specific legal request to seek alternatives to OLF. I am

mentioning this so that if there is judicial review of this EIS, then the documentation is presented into the record for a rapid rebuttal.

### **PLEASE USE THE AFTERBURNERS AT OLF EVERY BOUNCE!**

It smacks of coddling COER or of children with training wheels flying the EA-18G Growler when the Growlers do not use the afterburners at OLF Coupeville. Using afterburners at OLF gets the OLFers doing dances. *You mind* using the afterburners more often like below please:



Figure 7: Vapes and Burner at OLF... Priceless

I mean I'm an afterburner extremist, as I will travel into Abbotsford, Canada and Joint Base Lewis-McChord in the name of getting afterburner in my life from the US Navy Tac Demo. I would appreciate very much the use of afterburner at OLF Coupeville on a regular basis *please*, it's time noise complainers were told to be elsewhere.

Once those afterburners of freedom go off, it's the brightest lights in the sky. Your patriotic pride soars. You know the people whining and requesting "noise abatement" will never, ever support the Navy. Instead you get a full airshow in *your* community.

Speaking of airshows and the community, you mind please having the US Navy Tac Demo come up to NAS Whidbey Island and perform every single year please? I mean I *am* an afterburner extremist but quite frankly who does not want the thrills of a Super Hornet pulling the vapes out of the sky and lighting the skies with afterburner? Oh people who will never love you, people who hate the military, people who want to sink the Navy. Please *stop* accommodating folks who move next to a Naval Air Station and complain about the noise. Instead you should openly encourage, welcome and reward afterburner extremists!

After all, I really appreciate the 142<sup>nd</sup> Fighter Wing out of Oregon for protecting our local air sovereignty. I also had the honour of touring the Wing last August, but the best part, bar none was the afterburner take-off that put an *afterburner grin* on my face. Especially as I can *choose* to wear hearing protection so when I get home or back to my hotel, I can hear me type and my favourite podcasts.

My point being: Afterburner take-offs make me smile. Please use afterburners. Thanks!

## PUBLIC NOTIFICATION

### Field Carrier Landing Practice (FCLP) Schedules

Let me begin by stating as per page 1-20 of your Draft EIS with my emphasis, "The installation [NAS Whidbey Island] frequently corresponds with numerous media outlets and utilizes its webpage and social media, such as the station's Facebook page, to share flight schedules and other information and to solicit public feedback. Where possible and if weather conditions allow, station officials modify flight operations to minimize noise impacts, such as during weekends and during school exams. ... The installation will continue to publish FCLP schedules and issue notifications for additional activities, such as weekend festivals." I ask you continue to publish the NAS Whidbey Island FCLP schedules please so folks who support OLF can attend and those claiming adverse impacts from OLF can make alternative plans. These FCLP schedules are vey much appreciated.



Figure 8: USN Tac Demo Afterburner... at Abbotsford Airshow, BC, Canada



Figure 9: Oregon ANG F-15C Afterburner Take-Off

Let me add as well that as early as 1968 you were having the Whidbey News-Times publish schedules with the times – not just some “mid afternoon” or “late evening” statement. Here’s from the October 30, 1969 Whidbey News-Times as per Appendix E-7:



Figure 10: FCLP Schedule at OLF in October 30, 1969 Whidbey News-Times

Also, here’s from the 16 December 1987 Whidbey News-Times:

The image shows a newspaper clipping titled "Navy Field Landing Practice For week of Dec. 16-22". It features a photograph of a Navy aircraft on a runway. Below the photo is a table with the following data:

	Wed.	Thurs.	Fri.	Sat.	Sun.	Mon.	Tues.
<b>Ault Field</b>	5-9 p.m.	10 a.m. 1 p.m.	clear	clear	clear	11 a.m. 9 p.m.	11 a.m. 9 p.m.
<b>OLF Coupeville</b>	clear	clear	clear	clear	clear	2:45-4:45 p.m.	4:45-9 p.m.

All times listed in this schedule are subject to change due to weather, operational commitments and/or training requirements. This information is also broadcast daily on radio station KJTT, 1110 AM. For current FCLP schedules, call the NAS Whidbey Weather/FCLP hotline at 257-2675.

Figure 11: December 16-22, 1987 FCLP Schedule

I also think it would build trust if the Navy would also please make public each week how close the Navy is to its annual allowance of using OLF. Somehow on 25 June 2016, USN Captain Geoffrey Moore can e-mail Island County Commissioner Price-Johnson as per Appendix F,

I discussed the downwind altitude with my operations officer after our discussion on Tuesday, and confirmed that the daytime altitude of 800 feet and the nighttime altitude of 1,200 feet has not changed in as far back as they have been stationed at NAS Whidbey Island. These altitudes are the same ones that we fly at the carrier, and with the precision requirements of that difficult task, the best training is achieved when we can duplicate the sight picture of the same altitude as the carrier pattern.

## Response to Draft EIS for EA-18G "Growler" Airfield Operations at NAS Whidbey Island

As of this morning, we have flown 3,906 operations of our NEPA allowance of 6,120 operations. That translates into 56 hours and 7 minutes total flight time at OLF Coupeville since January 1st; 5 hours and 14 minutes of that total has been flown between 10 p.m. and midnight.

I wish this above information was please attached to the weekly FCLP schedules. Thanks.

### Flyovers & Guest Stars

Since this is about EA-18G Airfield Ops, I really think it is germane to bring up VAQ Wing flyovers and "guest stars" that train with the VAQ Wing. I submit it would be in the US Navy's interests to let folks know if/when NAS Whidbey Island is going to do flyovers and other public participation. I, for one, would travel to see a flyover. Also I'd like to request a flyover in afterburner of local airshows and also, obviously the Santa Clara Forty Whiners fan club in Central Whidbey calling themselves COER.

Furthermore, for some folks having a website like the Royal Australian Air Force (RAAF) or Facebook postings by the 142<sup>nd</sup> Fighter Wing out of Oregon notifying folks of increased flight ops helps folks plan their lives. I think NAS Whidbey Island should continue to advise folks of Field Carrier Landing Practice flight ops but also let people know ASAP when there are training exercises the base participates in and also for instance a B-1B Bomber is coming or a F-22 Raptor or the VFC-12 "Fighting Omars" come to town so folks can enjoy a little airshow in their community!

Obviously if um, two certain US Marine Corps Majors and a Captain in their C-130J could please come to Whidbey and reenact being "Fat Albert" pilots, that would be much appreciated. The more guest stars, the merrier. Beat COER! Thanks.



Figure 12: VFC-12 "Fighting Omars" Spotted on 2013 Public Tour of NAS Whidbey

### POTENTIAL OTHER SERVICES' USE OF OLF

I have to inquire that when OLF sits unused by NAS Whidbey Island, why not use the OLF for C-17s out of McChord AFB to practice short-field landings and take-offs? Or Marines come up to practice with C-130Js and V-22s? Or Fort Lewis helicopters to come up to OLF and scrimmage? Or bring some Hornets up from NAS Lemoore for extra Field Carrier Landing Practice? I mean, on the days NAS Whidbey Island isn't using OLF, why let OLF sit idle if the environmental impacts will be less than the EA-18G Growler? Why should the Navy Department let the Marine Corps and the Air Force and yes, the Army not join in the fun in honoring noise requests? I mean there are some who'd pay a PREMIUM to live next to an airport and who would love OLF to never sit fallow!



Figure 13: Yes, C-17s Need Short Fields Too

### SECTION 106 COMMENTS

#### A Few Words About the Section 106 Process

I am publicly registering my fundamental displeasure where most of the details about process has been found via public disclosure requests and well-timed leaks by government relations special operatives such as I. I am fundamentally disturbed at the thought the Section 106 process Barriergate (informal name for the political fallout from placing eco-blocks around OLF) group tilts so far anti-OLF and pro-OLF voices are excluded.

## Response to Draft EIS for EA-18G "Growler" Airfield Operations at NAS Whidbey Island

Let's not forget: COER has said many times in many online and physical public forums at a minimum fundamental opposition to the EA-18G Growler at NAS Whidbey Island as per Appendix G – but I am responding to the US Navy Department and a US Navy Draft EIS before me so I will ask instead: Where is the consultation with *proponents* for the NAS Whidbey Island?

### Area of Potential Effect (APE)

I ask the US Navy please take this position: The only APE that matters is OLF Coupeville and maybe Ebey's NHR if Ebey's NHR Board makes this a condition of *embracing* OLF. Period.

### Mow the Damn Grass

Sometimes when I show up for a Field Carrier Landing Practice (FCLP), I find the grass has not been mowed. Considering I have pictures of tires smoking and you have jets bouncing around, there is a potential fire hazard. I have no desire to ignore something that could interfere with farming operations at Ebey's NHR. Also as a former farmer until my misaligned spine got worse; I know that weeds allowed to grow on a neighbor's yard can easily spread for square miles. Finally, as somebody who likes to photograph the flight ops the natural vegetation can interfere with photo ops. For all of those reasons, *please* mow the grass at least every two weeks as you would your home lawn.



Figure 14: *Please Mow the Grass Before FCLP*

So what if somebody has to see some concrete blocks entering Ebey's NHR? Big whoop-dee-do. COER and their pals whining about noise disclosure say folks were not aware driving past OLF – so why not make OLF more visible to folks driving by? Why does Navy Region Northwest seem so eager to accommodate the folks who have litigated against NAS Whidbey Island but *not* the supporters of OLF?

### What About Rewarding the OLFers Instead?

I'm going to make the suggestion at the end of the day, instead of trying to appease the unappeasable and angering your friends... I mean... just do anything to change slightlines a little at OLF and COER and their pets in DAHP scream, "ADVERSE IMPACT" and now we get years of process inside a leaky box to appease the unappeasable.

So if we're going to have this nice, tidy arrangement let's just swing the pendulum so far where COER gets the message, "COER, EVEN WHEN YOU'RE SCRIPTED, YOU'RE USELESS!" I would really like to see a conversation about making OLF more aviation photographer friendly. I mean maybe a circumference trail? Maybe push in the lines so folks can get closer as long as we do not interfere with Field Carrier Landing Practice? Maybe an annual photocall at the OLF? Make OLF more publicly visible and there you go. This fan of OLF wants to have a passionate fan base that Navy servicemembers can be proud of OLFers support.

### Honor the Heroes Who Saved OLF

Let me quote former General Stanley McChrystal who said on National Geographic's American War General when he was touring Gettysburg monuments, "They put volunteer because they were proud to have been volunteers. They were communicating they weren't drafted. That they were here by choice. The monuments were put after the fight. And for many years I had a tough time understanding what the monuments were about because I thought they were about guys wanting credit for what they done, put a monument here,

<sup>o</sup> Online being e.g. Facebook, physical public forum being a public meeting of elected officials.

beat their chest and say I'm a hero. That's not what they are. They were trying to simply mark a place where they had served and where they'd made a sacrifice. They wanted some validation that what they had done mattered. Because it doesn't feel good at the time. It's difficult and it's dirty and it's frightening and sometimes you're not quite the soldier you want to be and you're part of things that you'll never think you'll have to be part of. You need some affirmation. It's important 150 years ago and it's important today."

To that end, you folks on the Navy EIS Staff please honor yourselves on the Navy EIS Staff with a plaque or something with your names. You better honor one U.S. Attorney Rachel K. Roberts who stopped the 2015 COER Injunction Attempt – maybe a bench at a OLF viewing site? Please consider honoring the US Navy sailors who have served at OLF as well. As far as me goes, just name a bus stop at OLF That complies with AICUZ the "████████ Bus Stop" with a plaque that says, "Yeah you can have autism, you can have a bad back, you can have bad left eye and you can have PTSD... but you can *still* serve and give back to the greatest nation on the planet. America is GREAT because Americans give back and make America GREATER." *Thanks.*

## RENAMING OLF COUPEVILLE (KNRA)

This request may or may not be within scope of the Navy's Environmental Impact Study, but considering the Town Government of Coupeville's *seeming* opposition to this study, considering most of the opposition to Field Carrier Landing Practice at OLF and considering how the call letters of NRA are absolutely political and offensive – I think it's time for a name change.



Figure 15: Coupeville 6/2013 "Zip Code Forum"

- OLF (Michael J.) Smith would be to honor the late A-6 pilot and NASA Shuttle Pilot who perished in the Challenger explosion. Some of Smith's service was at NAS Whidbey Island.
- OLF (William C.) McCool would be to honor a former VAQ-133 Wizards EA-6B Landing Signal Officer who worked at OLF and then served as a test pilot, a department head in VAQ-132 Scorpions, as a test pilot and then in NASA. Sadly perished in the Columbia tragedy.
- OLF (Nate) Barton may be a long shot, but if the first two don't work then I like the idea of naming OLF after the first NAS Whidbey Island Blue Angels pilot. I have to say the 2014 & 2015 Blue Angels seasons were spectacular looking for Blue Angel #3 and Blue Angel #4 respectively.

Also um, considering my mother Linda was attacked in front of her Autistic Spectrum (Asperger's) son with a gun obtained through a loophole the National Rifle Association or NRA fought to defend for felons... I would really appreciate the call letters be replaced on OLF Coupeville please to KNZR or KNLR. When you do change the call letters, I want my two parents to cut the orange ribbon and when they do, I want it real clear that was for my folks. Not me. Thanks, as I credit my parents with a lot of who and what I am.



## CONCLUDING THOUGHTS

*This is a moment to seize. The Kaleidoscope has been shaken. The pieces are in flux. Soon they will settle again. Before they do, let us re-order this world around us.*

Right Honorable Tony Blair, Former British Prime Minister

Indeed, this is a moment to seize. You are seeking a clear mandate to keep OLF safely free from future threat, and I have sought to help you.

It's blatantly obvious the legally allowed time to appeal the 2005 Environmental Assessment (EA) into EA-18G Growler basing at NAS Whidbey Island has passed. As such, all this EIS can do is build upon the EA and make NAS Whidbey Island a better home for the VAQ Wing. Which is the goal of my comments.

That said, I want to be straight-up with all you US Navy folks and I want to explain in my own words why this fire in my belly. Yes, I love afterburners. Yes, I love vapes. Yes, I love "OLF Fridays". Yes, I love EA-18Gs. But you know what I love a lot more? OUR TROOPS. I am ASHAMED I am not in uniform defending this country and our freedoms. As such, the LEAST I can do, the LEAST I can do as an American is stick up for OUR troops and exercise my rights.

I also appreciate and want to commend the EIS Staff on what has been a stressful time. Some of you have given birth to children during this process. Some of you have been treated with absolute disrespect during this process. I appreciate your sacrifices and efforts to make sure America's Navy answered to We The People. So much so as of 3 December as per Appendix H, 500 "Post Clicks" on an ad that simply said, "Support [Naval Outlying Field Coupeville](#)? Then get in a pro-OLF comment to <http://whidbeyeis.com/Comment.aspx> please."

If there was any realistic alternative to using OLF, I would lend support but *your* Appendix H: Civilian Airfield Analysis makes pretty doggone clear there is no alternative to NAS Whidbey's OLF. I also agree wholeheartedly with what is written in pages 1-7 & 1-8. But what is said on page 2-2 is acute and perfect for quoting in a conclusion:

The Navy established requirements for FCLP airfields in order to ensure that FCLP realistically trains Naval aviators to land on an aircraft carrier and used these requirements to inform the development of alternatives. These requirements are crucial because landing on an aircraft carrier is perhaps the most difficult operation in military aviation.

Now let's see this through to a logical conclusion. Scenario A for OLF provides the flexibility the troops I talk to want and when you are falling 700 feet per minute at 159 miles an hour to catch one of four wires in a very tight spot – sometimes at night, safety and ample training should take priority. Lots of afterburner. Remember the men and women who fought hard to stop COER *for America*. Rename OLF. Let's bring back to OLF the days when Growlers from all VAQ carrier-borne squadrons – not just the vital Fleet Replacement Squadron – could come and bounce in afterburner please as you, US Navy, are *not* the problem:



Figure 16: VAQ-139 Cougars Kindly Using Afterburner at OLF

**LIST OF APPENDICES**

- **Appendix A: 2013 Petition Cover Sheet: SAVE OLF COUPEVILLE,**  
<http://www.ipetitions.com/petition/save-olf>
- **Appendix B: 2016-07-14 E-mail From Captain Geoffrey Moore, USN**
- **Appendix C: 2015-05-29 Declaration of Captain Benjamin Hewlett**
- **Appendix D: 2015-05-29 Declaration of Captain Mike Nortier**
- **Appendix E: Selected Newspaper Articles**
  1. 1967-01-26 Whidbey News-Times (WNT): Navy Works on Coupeville Strip
  2. 1967-08-03 WNT: Coupeville Airstrip Readied For Operations
  3. 1967-09-21 WNT: Coupeville Flights Curtailed
  4. 1987-11-04 WNT: Anti-Noise Group Launches Three-Prong Attack
  5. 1992-05-09 WNT: County supporting Navy during '87 controversy
  6. 1991-05-08 WNT: WISE membership vote in favor of the Navy's decision to close NAS Whidbey
  7. 1969-10-30 WNT: Coupeville Field
- **Appendix F: 2016-06-25 E-mail From Captain Geoffrey Moore, USN**
- **Appendix G: COER Wants To Get Rid of NASWI**
- **Appendix H: Stats of AvgeekJoe Productions' Facebook Ad**

**NOTE:** Please do not attempt/bother to respond to each paragraph in these appendices, they are simply source material for your reference to fine-tune the EIS and solidify my remarks.

Respectfully;



## APPENDIX A: 2013 SAVE OLF COUPEVILLE PETITION COVER SHEET

## SAVE OLF COUPEVILLE



[The Petition](#) [1](#) [Highlight](#) [2](#) [Comments](#) [1626](#) [Signatures](#)

TO THE UNITED STATES NAVY; REAR ADMIRAL BOLIVAR, NAVY REGION NORTHWEST; NAS WHIDBEY ISLAND CAPTAIN NORTIER, BUT MOST OF ALL TO THE ELECTRONIC ATTACK WING, US PACIFIC FLEET THROUGH CO CAPTAIN SPRINGETT II AND XO CAPTAIN WALKER...

Where Citizen's of Ebey's Reserve have sued the US Navy over OLF Coupeville (KNRA, America's OLF) **AFTER** being required since 1992 in Island County Code to sign at the point of sale noise disclosure forms noting the presence of a military jet soundtrack... we have a message for you:

**a) We appreciate the superheroic service of all in the Electronic Attack Wing U.S. Pacific Fleet keeping America safe. You inspire and motivate almost all of your fellow Americans to be better Americans!** So we're going to get your backs... for once.

**b) We oppose the threat to sailors' safety, our nation's defense and the regional economy the closure of OLF Coupeville would represent.**

**c) We call upon the United States Navy to agree to an EIS with Citizen's of Ebey's Reserve in return for tolerance of OLF operations so that US Navy representatives can finally discuss with the general public and not just select audiences:**

>Why America's OLF is so vital to the national defense.

>What exactly an alternative OLF would cost at say preferably Skagit Regional Airport (KBVS), or possibly Quillayute Airport (KUIL), the Yakima

Firing Range, or Hanford Nuclear Reservation *versus* eminent domain around OLF Coupeville (KNRA).

>How we can mitigate the impacts from OLF Coupeville, whether that be a tourism campaign to recruit international aviation fans to see OLF Coupeville now that America's OLF on a schedule, text messages 15 minutes before OLF Coupeville use, better Island County Planning policies, and/or eminent domain.

d) We have news for [REDACTED], President of the Citizens of the Ebey's Reserve: You have said "close the base" and "the NAS base keeps the Island dysfunctional". We say instead: **"Keep NAS Whidbey Island and OLF Coupeville open until world peace, which we all hope is soon."**

e) **This better be EA-18G Growling loud to Electronic Attack Wing, US Pacific Fleet: Any** remaining silence from your real friends ends. A reach for a temporary restraining order against training at OLF Coupeville for the freedom of all 3,143 counties is beyond the pale and deserves a most blunt response in gratitude for your superheroic service.

**KEEP 'EM GROWLING AND PROWLING...** BUT *YOU COME HOME TO US!*  
THANK YOU SO MUCH!!

SPONSOR

[REDACTED]

**APPENDIX B: 2016-07-14 E-MAIL FROM CAPTAIN GEOFFREY MOORE, USN**

**From:** Moore, Geoffrey C CAPT CO NAS Whidbey Is, N00  
**To:** [Helen Price Johnson](mailto:Helen.Price.Johnson)  
**Cc:** [Pam Dill](mailto:Pam.Dill)  
**Subject:** RE: OLF flights too low  
**Date:** Thursday, July 14, 2016 8:15:46 AM  
**Attachments:** [smime.p7s](#)

Thanks Helen for forwarding your concern and I'll relay to the Growler wing.

Note, the crews cover altitude adherence in every brief before every OLF Coupeville flight--not only because of the requirement to adhere to our air operations manual, but because it is important to be on altitude and airspeed when a pilot commences their 180 degree descending profile to landing. Any failure to be on altitude--high or low--will most often result in a poor landing pass. I liken it to a boat's approach to a pier--if you start your transition with too much speed, the work load is significantly higher as you have to decelerate more than normal, therefore increasing the odds of overrunning the pier or hitting it with higher than desirable speed.

It's the same thing in the aircraft, only with speed, altitude, and maintaining an optimal abeam distance from the runway. As we develop muscle memory for the approach, it is a disadvantage to be high or low, fast or slow from the ideal starting point when one commences their landing approach; in this situation the pilot will have to work harder to get the aircraft back on parameters as they make the approach which will more likely than not result in a less than optimal landing or waveoff. Another way to look at it--not being on altitude or airspeed or at proper distance from the runway is like a professional batter not being ready to swing when the pitcher commences their windup--they will most likely never catch up.

Failure to hit their parameters when flying our Field Carrier Landing Practice approaches at Ault Field or OLF Coupeville will only be more pronounced when a pilot makes their approach to the moving flight deck on the carrier--this is why our Landing Signal Officers constantly emphasize this as they review each pass. I didn't get to monitor much of the FCLP's at the OLF on Monday on my way to Greenbank Farms for our Lake Hancock open house, but what I did see seemed to be a normal pattern. (The Open House went well, a lot of participation and good feedback from the public. The majority were in favor of our preferred alternative.)

Sincerely,

CAPT Geoff 'Jefe' Moore  
 Commanding Officer, NAS Whidbey Island  
[Geoffrey.Moore@navy.mil](mailto:Geoffrey.Moore@navy.mil)  
 Office Phone: 360.257.2037

"For OFFICIAL USE ONLY (FOUO) - This email and attached files may contain Privacy Sensitive information or Law Enforcement Sensitive Information. Any misuse or unauthorized disclosure may result in both civil and criminal penalties. If you received this document in error, please notify me at the above phone number and destroy the document immediately in accordance with Privacy Act procedures."

-----Original Message-----

**From:** Helen Price Johnson [<mailto:H.Price.Johnson@co.island.wa.us>]  
**Sent:** Tuesday, July 12, 2016 9:33 AM  
**To:** Moore, Geoffrey C CAPT CO NAS Whidbey Is, N00  
**Cc:** Pam Dill  
**Subject:** [Non-DoD Source] OLF flights too low

Capt. Moore,

I am getting reports from residents that some of the pilots were flying especially low yesterday. This greatly intensifies the noise impact and is not necessary. Please help to minimize the impact to the local farming community by encouraging the trainees to stay well above the treetops when passing over these workers today and in the future.

Thank you for your help,  
 Helen Price Johnson

Island County Commissioner, District 1

Sent from my Verizon Wireless 4G LTE DROID

Appendix C

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District Judge Thomas S. Zilly

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CITIZENS OF THE EBEBY'S RESERVE  
FOR A HEALTHY, SAFE & PEACEFUL  
ENVIRONMENT,

Plaintiff,

v.

U.S. DEPARTMENT OF THE NAVY;  
ADMIRAL PHIL DAVIDSON, in his  
official capacity as the Commander, Fleet  
Forces Command; and CAPTAIN MIKE  
NORTIER, in his official capacity as  
Commander Naval Air Station Whidbey  
Island,

Defendants,

No. 2:13-cv-1232-TSZ

DECLARATION OF CAPTAIN BENJAMIN  
HEWLETT

I, Captain Benjamin Hewlett, U.S. Navy, Commander, Carrier Air Wing ONE, do hereby  
declare as follows:

1. As Commander, Carrier Air Wing ONE ("CAG"), I am responsible for Airborne Electronic  
Attack Squadron 137, an EA-18G squadron home-based at NAS Whidbey Island. The EA-18G  
aircraft is essential to mission success. Field Carrier Landing Practice ("FCLP") training

1 provides EA-18G pilots with the necessary training that they need to safely land on a carrier after  
2 flying demanding missions, sometimes multiple times a day.

3 2. As CAG, I am responsible to the Commander of Carrier Strike Group TWELVE (a one-star  
4 Admiral) for the safe operation and mission accomplishment of all military aircraft launched and  
5 recovered from the Nimitz-class aircraft carrier USS THEODORE ROOSEVELT ("TR") (CVN  
6 71).

7 3. I was designated a Naval Aviator following completion of advanced aviator training in  
8 January 1995. Over the past 20 years, I have served as an operational aviator and a flight  
9 instructor, including duty as a Carrier Air Wing Landing Signals Officer, where I was  
10 responsible for the safe and expeditious recovery of all aircraft aboard the aircraft carrier. I have  
11 held several leadership roles at the squadron level, including a tour as a squadron commanding  
12 officer. I have served six tours on board aircraft carriers, including three deployments in support  
13 of Operation ENDURING FREEDOM ("OEF") flying combat missions into Afghanistan. I  
14 have flown approximately 3,500 mishap free flight hours, primarily in the S-3 Viking and the  
15 F/A-18C Hornet. I have personally flown the EA-18G "Growler" on numerous occasions, and I  
16 have flown out of NAS Whidbey Island and practiced FCLPs at Outlying Landing Field ("OLF")  
17 Coupeville. I have 760 carrier-arrested landings.

18 4. As CAG, my air wing is broken up into seven "squadrons" of aircraft. Each squadron is led  
19 by its own commanding officer and has a slightly different mission and set of capabilities. There  
20 is only one squadron on board that operates the highly advanced EA-18G aircraft—Airborne  
21 Electronic Attack Squadron 137 (VAQ-137), which is home-based in Whidbey Island,  
22 Washington. VAQ-137 has nine pilots and five jets. Due to the highly specialized nature of the  
23 Electronic Attack mission and the relatively small number of aircraft assigned, the EA-18G is a  
24 "high demand, low density" aircraft. VAQ-137 operates less than half the number of jets as my  
other squadrons. Even though they are small in number, they are critically important to not only  
major combat operations, but to the prevention of conflict. They make an impact across the  
spectrum of U.S. military operations that belies their small size.

5 EA-18G pilots fly daily in support of Operation INHERENT RESOLVE ("OIR"), the  
6 coalition military operation against the group commonly known as the Islamic State of Iraq and  
7 the Levant ("ISIL"). These flights are many hours in duration, supporting both U.S. and coalition  
8 forces engaged in the fight against ISIL. It is not unusual for a single aircraft to fly multiple  
9 missions in any given day. To support this, aviators operate on an intense and exhausting  
10 schedule. The EA-18G is critical to the success of the entire effort at the tactical, operational  
11 and strategic levels, so much so that if an EA-18G aircraft cannot support operations due to  
12 needed repairs or aviator unavailability, it is frequently the case that the mission is aborted.

13 6. The mission and tactical actions of the EA-18G in support of this operation are classified, but  
14 are crucial to the U.S. and coalition mission both in the air and on the ground. These aircraft and  
15 their highly trained aircrew deny the enemy freedom of action in the electromagnetic spectrum.  
16 They achieve this through the employment of their tactical jamming systems in support of both  
17 ground and air forces engaged against ISIL.

1 7. In order to effectively execute the mission against ISIL, TR and her aviators must operate in  
2 very confined water and air space in the Arabian Gulf. This water and air space includes not  
3 only all of the ships and aircraft from the Strike Group and my Air Wing, but also ships and  
4 aircraft from other Gulf State navies, air forces, and coast guards, as well as oil rigs, commercial  
5 shipping and air traffic. This complex operating environment makes aircraft launch and recovery  
6 exponentially more challenging than open-ocean operations. While the sequencing of aircraft  
7 launches is predictable, occurring approximately every 30 seconds, the sequencing of aircraft  
8 recovery is highly dynamic. The expeditious recovery of aircraft is absolutely critical to the  
9 safety of the ship, her crew and all other vessels and interests in the area. During aircraft  
recovery the aircraft carrier must maintain a constant course and speed, thus restricting the ship's  
maneuverability. If it takes longer to recover aircraft because undertrained aviators are unable to  
land on their first approach it increases already substantial risks and makes it difficult for the ship  
to avoid the unpredictable hazards that can rapidly develop. Aviators returning to the ship are  
especially taxed by the intensity of operations, so their skills absolutely must be second nature  
and perfected before deployment. Any deficiency in an aircrew's training prior to embarking on  
an aircraft carrier increases risk not only the lives of the aviators, but those sailors on the flight  
deck that are mere feet from the aircraft as it takes off or lands.

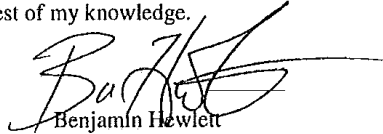
10 8. In any 24-hour period, over 100 jet and helicopter launches and recoveries are performed by a  
11 team of hundreds of dedicated sailors working together on the flight deck. The rapid launch,  
12 recovery, refueling, and rearming of aircraft from an aircraft carrier is a complex task involving  
13 pilots, maintenance personnel, and support personnel and represents a highly specialized system  
14 of operations unique to naval aviation, which must be choreographed and executed with  
15 precision. Naval personnel must learn how to launch, recover, refuel and rearm aircraft,  
concurrently, at night, often in bad weather, on an aircraft carrier flight deck. In those  
circumstances, safety is paramount: the constant threat posed by jet engine intakes and exhausts,  
turning propellers, and moving aircraft makes the aircraft carrier flight deck an extremely  
dangerous work environment.

16 8. Night carrier operations are the highest risk operations in aviation, but night combat  
17 operations are critical to mission success because of the diminished capability of the enemy to  
18 respond to coalition and U.S. ground and air operations. Every night, EA-18G aviators land  
19 aboard ship, often in a pitch-black environment with rolling seas. Their combat missions are  
20 fatiguing and dangerous. Periodically, storms will move through the area, making seas  
21 unpredictable. Additionally, the environment in the Arabian Gulf is frequently hazy with low  
22 visibility. These poor environmental conditions significantly affect carrier flight operations in  
23 many different ways, and aviators must be well-trained and proficient in order to respond to the  
24 unique requirements of the different circumstances that are encountered. The dynamic and high  
risk nature of night carrier operations requires very strict night Field Carrier Landing Practice  
(FCLP) periodicities for aircrew proficiency prior to embarking the ship for any at sea period in  
order to ensure the an acceptable level of risk is maintained. Carrier landings are a perishable  
skill, and Navy policy mandates that FCLP training should be conducted within five days of  
landing on the aircraft carrier and must in no case be conducted more than 10 days prior to  
landing on the carrier. Having conducted FCLPs at OLF Coupeville, I believe OLF Coupeville  
provides a realistic environment in which to practice FCLPs. Any degradation of the ability for  
VAQ-137 to conduct FCLPs in an environment as ideal as OLF Coupeville prior to embarking



1 aboard ship will degrade U.S. and coalition combat effectiveness while creating unacceptable  
2 risks for the aviators and crewmembers aboard TR.

3 I hereby swear under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing  
4 information is true and correct to the best of my knowledge.

5   
6 Benjamin Hewlett  
7 Captain, U.S. Navy

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Appendix D

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District Judge Thomas S. Zilly

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CITIZENS OF THE EBEBY'S RESERVE  
FOR A HEALTHY, SAFE & PEACEFUL  
ENVIRONMENT,

Plaintiff,

v.

U.S. DEPARTMENT OF THE NAVY;  
ADMIRAL PHIL DAVIDSON, in his  
official capacity as the Commander, Fleet  
Forces Command; and CAPTAIN MIKE  
NORTIER, in his official capacity as  
Commanding Officer Naval Air Station  
Whidbey Island,

Defendants,

No. 2:13-cv-1232-TSZ

DECLARATION OF CAPTAIN MICHAEL  
NORTIER

I, Captain Michael Nortier, U.S. Navy, Commanding Officer, Naval Air Station Whidbey Island, do hereby declare as follows:

1. I have extensive experience in Navy operations and currently serve as Commanding Officer of Naval Air Station ("NAS") Whidbey Island. In my experience, shifting all Field Carrier Landing Practice ("FCLP") operations from Outlying Field ("OLF") Coupeville degrades the quality of

1 training for EA-18G pilots practicing for dangerous carrier landings; negatively impacts all other  
2 operations at NAS Whidbey Island; and increases impacts to the community near Ault Field.

### 3 BACKGROUND

4 2. I was commissioned as a Naval Officer through the Naval Reserve Officer Training Corps in  
5 1990, and was designated a Naval Aviator in 1991. Over the course of 25 years in the Navy, I  
6 have been assigned to various squadrons, have held numerous positions, and have embarked on  
7 many ships in support of deployed operations. I was particularly involved in aviation safety  
8 during my tour as the Air Operations Officer for Commander, Carrier Strike Group Seven,  
9 embarked on USS RONALD REAGAN (CVN 76) in 2009. In addition to my duties as Air  
10 Operations Officer, I served as Strike Group Seven Safety Officer, interacting with Carrier Air  
11 Wing FOURTEEN and USS RONALD REAGAN on all safety related matters, including  
12 aviation safety. This assignment included a deployment to the Arabian Gulf in 2009, Rim of the  
13 Pacific Exercise off the coast of Hawaii in 2010 and a Western Pacific deployment in 2011. I  
14 have also served on the staff of the U.S. Pacific Fleet in the Operations directorate and deployed  
15 with the Army to Iraq in 2012. Over the last 25 years I have accumulated over 4,300 flight hours  
16 in naval aircraft and have worked with a variety of platforms deployed to carriers and surface  
17 combatants.

### 18 NAS WHIDBEY ISLAND

19 3. I have been the Commanding Officer of NAS Whidbey Island since February 2013. As  
20 Commanding Officer, I have overall responsibility for all daily base facility and air operations on  
21 and around NAS Whidbey Island, which includes activities at Ault Field and Outlying Landing  
22 Field ("OLF") Coupeville. Both airfields are located on Whidbey Island, with the OLF  
23 approximately 10 miles south, by air, from Ault Field. I am responsible for executing,  
24 coordinating, and integrating shore installation services and support functional programs in  
25 support of Navy operational missions. NAS Whidbey Island is the only naval aviation  
installation in the Pacific Northwest. For over 40 years, NAS Whidbey Island has been the home  
of all Navy Electronic Attack (VAQ) squadrons in the United States. The VAQ community is  
made up of EA-18G "Growler" aircraft supporting Navy carrier fleet and Department of Defense  
expeditionary missions. The predecessor to the Growler was the EA-6B "Prowler."

4. Ault Field supports an average of 65,000 military operations a year, comprising operations  
from aircraft home-based at NAS Whidbey Island, including fourteen electronic attack  
squadrons, five maritime patrol and reconnaissance squadrons, one logistics squadron, and one  
search and rescue helicopter unit, as well as operations from other transient military aircraft.

### FIELD CARRIER LANDING PRACTICE

5. Unlike other aircraft takeoffs, which climb to altitude and depart the local area, aircraft  
conducting Field Carrier Landing Practice (FCLP) training take off and remain within 3-4 miles  
of the airfield during the entire evolution. When an FCLP period is occurring with multiple  
aircraft, this is generally considered a closed pattern, which means that other aircraft cannot take  
off or land.

### NORTIER DECLARATION

- 2 -

U.S. Department of Justice  
7600 Sand Point Way NE  
Seattle, WA 98115

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OLF COUPEVILLE

6. OLF Coupeville has one runway oriented generally North/South, and is called runway 32 or runway 14, depending on direction of approach. The weather and winds determine the direction in which to conduct FCLPs. The local prevailing winds support runway 32 usage most of the year. FCLP flight patterns for OLF Coupeville were historically used by the EA-6B and A-6 aircraft, which shared similar flight characteristics. In the past, the flight pattern for runway 14 was adjusted for noise abatement purposes for homes on the eastern coastal boundary. Additionally, noise abatement procedures were designed to avoid flying over Long Point and a bird farm that is no longer in existence, and those procedures are still followed. Even with these modifications to the pattern, the EA-6B and A-6 could operate within acceptable parameters and use runway 14 when the meteorological conditions favored this runway. The EA-18G has a slightly different required flight profile in the FCLP pattern due to differences in weight and flight characteristics. As a result, the EA-18G cannot safely operate within the confines of the daytime runway 14 parameters currently in place. The Navy is examining runway usage and historical noise abatement procedures as part of its ongoing EA-18G Environmental Impact Study. Until that study is complete, runway 14 is rarely used for FCLPs.

7. I was in command of NAS Whidbey Island on June 28, 2013 when U.S. Fleet Forces halted flight operations at OLF Coupeville, and when FCLPs at OLF Coupeville resumed in January 2014. Ault Field was utilized to meet most of the remaining FCLP training requirements for that year. The suspension of flight operations at OLF Coupeville created operational impacts that were not sustainable, either as a permanent solution or as a temporary solution extending much longer than what was experienced in 2013.

8. During November of 2013, as several squadrons conducted FCLPs in preparation for deploying on aircraft carriers, other aircraft awaiting departures and arrivals encountered extensive delays, in some cases greater than 45 minutes. The back-up of aircraft waiting to take off or land accumulates when closed-pattern FCLPs are conducted at Ault Field. Because FCLPs are so closely sequenced, non-FCLP aircraft must hold on the taxiway to await a gap in flying to safely depart. Backups on the airport taxiways due to FCLPs lead to missed training windows in military operations areas (MOAs) and military training routes (MTRs), which are tightly scheduled to meet the requirements of 20 squadrons assigned to NAS Whidbey Island.<sup>1</sup> In order to relieve the congestion on the ground in 2013, the air traffic controllers had to create space between airborne FCLP aircraft—to create an opening in what is normally a closed

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<sup>1</sup> MOAs and MTRs are subsets of special use airspace (SUA) established by the FAA. They have specific vertical and horizontal boundaries within which military aircraft conduct training. NAS Whidbey Island schedules MOA and MTR use and deconflicts scheduling with other route users. NAS Whidbey Island provides flight altitudes, route widths, and times to Flight Service Stations, which in turn are responsible for providing that information to the general aviation public for safety. Therefore, in the interest of flight safety, and to allow sufficient time to disseminate the advisory information, MTR entry times are firm. Entry onto Instrument Route MTRs must be within five minutes, and entry onto Visual Route MTRs must be within three minutes of scheduled times. Missed SUA times results in missed training and, therefore, delays or degrades readiness.

1 pattern—so that other aircraft could take off or land. This lengthened the FCLP pattern so that  
2 aircraft flew outside the standard FCLP patterns. This has a detrimental impact on FCLP  
3 training, because the pattern being flown no longer closely resembles the pattern flown at sea. It  
also means that FCLP aircraft fly over different locations in the community than under a  
standard pattern, which tends to give rise to additional noise complaints.

4 9. The temporary closure of OLF Coupeville in 2013 stressed our capacity to meet training  
5 requirements in order to support military readiness and caused a greater impact on the  
6 community surrounding Ault Field. Having to schedule operations at Ault Field around FCLP  
7 training results in extending the flight hours in a given day to perform other necessary flight  
8 operations. This means flights occur later in the evening, which increases the duration of the  
9 impact on the community.

10 10. The population surrounding Ault Field is greater than that surrounding OLF Coupeville,  
11 which means noise impacts from aircraft operations at Ault Field impact a greater number of  
12 people than at Coupeville.<sup>2</sup>

13 11. Plaintiff asserts that the Fleet Replacement Squadron (“FRS”) is using five aircraft in the  
14 pattern during FCLP training. Training requirements only permit up to five aircraft during one  
15 FCLP session; however, five aircraft are rarely scheduled because the FRS pilots are less  
16 experienced at flying the Growler or flying in the vicinity of NAS Whidbey Island, so they will  
17 normally only schedule up to four aircraft. FRS pilots are more likely to need this extra cushion  
18 in order to keep the FCLP pattern within the lateral limits of the OLF.

#### 13 OLF COUPEVILLE NOISE ABATEMENT AND MITIGATION MEASURES

14 12. NAS Whidbey Island has established noise abatement and mitigation measures. These  
15 measures consist of working with our local communities to modify flight operations to minimize  
16 our impact when possible. My staff and I meet often with elected officials, school  
17 representatives, and community organizations and groups. When schools notify us about their  
18 testing schedules, we adjust our flights if weather conditions allow. During weekends, we  
19 minimize flights at OLF Coupeville to limit disturbance. Additionally, in an attempt to make the  
20 public more aware of our planned operations, we continue to publish flight schedules for OLF  
Coupeville on the NAS Whidbey Island website and Facebook page, and in the local media  
outlets such as Whidbey News Times one week in advance. We send this flight schedule to a  
wide range of area media outlets to ensure maximum distribution of the information. In 2014,  
we worked with the Mayor of Coupeville and Island County Commissioner to identify  
community events and publish a planning schedule that covered the summer to allow the  
community to be assured OLF Coupeville operations would not impact these events.

21 13. As Commanding Officer of NAS Whidbey Island, I make every effort to minimize the  
22 Navy’s impact on surrounding communities when possible, recognizing that flight schedules are

23 <sup>2</sup> Population data shows that in 2010, Coupeville, Washington population was 1,831 and Oak  
24 Harbor, Washington population was 22,075. See Attachment 1.

1 dictated by training and deployment schedules. NAS Whidbey Island practices noise abatement  
2 and mitigation procedures to control the routing of routine flights to minimize overflight of  
populated areas.

3 14. My staff and I work with the local communities to promote development compatible with air  
4 operations. The 2005 AICUZ provides Navy recommendations for compatible land use and is a  
publicly available document. This information is shared with the prospective home buyers in the  
5 area upon request, and it is also easily found online.

6 15. Accident Potential Zones (“APZs”) are planning tools for local planning agencies and are  
7 governed by Navy instruction (OPNAVINST 11010.36C). APZs are areas where an analysis of  
8 historical flight data shows an aircraft mishap is most likely to occur should one occur. They do  
9 not reflect the probability of an accident. Accidents near OLF Coupeville are very rare. APZs  
10 follow arrival, departure and pattern flight tracks. The requirement to establish APZs is  
11 dependent on the number of flight operations that occur in a particular flight track at the runway  
12 or airfield. Not all runways or airfields require an APZ. A runway or airfield requires APZs  
13 when 5,000 or more flight operations occur annually over a specific flight track. For purposes of  
14 APZs, a flight operation is considered a landing or a takeoff, but not both combined. In other  
words, an APZ is required if a flight track has 5,000 take offs or 5,000 landings, but not 2,500 of  
each. It should be noted that flight operations for FCLPs are calculated differently than  
operations for APZs. Each FCLP is counted twice, or two operations. One operation is the  
landing, and one is the takeoff. Accordingly, if OLF Coupeville experiences 6,120 FCLP  
operations, that would equate to 3,060 landings, and 3,060 takeoffs, which does not meet the  
5,000 take-off or landing threshold for establishment of an APZ for flight tracks at OLF  
Coupeville’s runway 14 or runway 32. OLF Coupeville does not currently experience the  
requisite number of operations per flight track and, therefore, per Navy direction, does not  
require APZs.

15 OLF COUPEVILLE FCLP DATA

16 16. During the entire year of 2014, Navy aircraft conducted FCLPs at OLF Coupeville over 44  
17 days, all during the work week; of those 44 days, 14 days included acoustic night operations (that  
18 is, between 10 p.m. and 7 a.m.) with only two of the acoustic night operations extending past  
19 midnight (June 26 and Aug 12). Since January 2015, Navy aircraft have conducted FCLPs at  
OLF Coupeville for 20 days, all during the work week; of those 20 days, only one day included  
acoustic night and that single event ended at 10:57 p.m. Please see Attachment 2 for specific  
times that 2014 and 2015 FCLPs started and finished.

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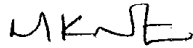
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24 NORTIER DECLARATION

1 CONCLUSION

2 17. Significant changes such as enjoining FCLPs at OLF Coupeville will result in detrimental  
3 effects to airfield operations and military aircrew training, and increased impacts to the  
4 communities surrounding Ault Field.

5 I hereby swear under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing  
6 information is true and correct to the best of my knowledge.



7 Michael Nortier  
8 Captain, U.S. Navy

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NORTIER DECLARATION

- 6 -

U.S. Department of Justice  
7600 Sand Point Way NE  
Seattle, WA 98115

# **Attachment 1**



# **Attachment 1**

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Jan-14		Night Start	Night End	Total Day	Total Night	Total Day and Night	
			Start Time	End Time						
1							0:00	0:00	0:00	
2							0:00	0:00	0:00	
3							0:00	0:00	0:00	
4							0:00	0:00	0:00	
5							0:00	0:00	0:00	
6	14:32	19:20					4:48	0:00	4:48	
7							0:00	0:00	0:00	
8							0:00	0:00	0:00	
9							0:00	0:00	0:00	
10							0:00	0:00	0:00	
11							0:00	0:00	0:00	
12							0:00	0:00	0:00	
13	14:00	14:30	15:27	16:26			1:29	0:00	1:29	
14							0:00	0:00	0:00	
15	16:35	17:17					0:42	0:00	0:42	
16							0:00	0:00	0:00	
17							0:00	0:00	0:00	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27							0:00	0:00	0:00	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
31							0:00	0:00	0:00	
							<b>Monthly Total</b>	6:59	0:00	6:59

**OLF FLIGHT HOURS**

Feb-14

Day	Start Time	End Time	Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night
1							0:00	0:00	0:00
2							0:00	0:00	0:00
3							0:00	0:00	0:00
4							0:00	0:00	0:00
5							0:00	0:00	0:00
6							0:00	0:00	0:00
7							0:00	0:00	0:00
8							0:00	0:00	0:00
9							0:00	0:00	0:00
10							0:00	0:00	0:00
11							0:00	0:00	0:00
12							0:00	0:00	0:00
13							0:00	0:00	0:00
14							0:00	0:00	0:00
15							0:00	0:00	0:00
16							0:00	0:00	0:00
17							0:00	0:00	0:00
18							0:00	0:00	0:00
19							0:00	0:00	0:00
20							0:00	0:00	0:00
21							0:00	0:00	0:00
22							0:00	0:00	0:00
23							0:00	0:00	0:00
24							0:00	0:00	0:00
25							0:00	0:00	0:00
26							0:00	0:00	0:00
27							0:00	0:00	0:00
28							0:00	0:00	0:00
							<b>Monthly Total</b>	0:00	0:00

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Mar-14		Night Start	Night End	Total Day	Total Night	Total Day and Night
			Start Time	End Time					
1							0:00	0:00	0:00
2							0:00	0:00	0:00
3							0:00	0:00	0:00
4							0:00	0:00	0:00
5							0:00	0:00	0:00
6							0:00	0:00	0:00
7							0:00	0:00	0:00
8							0:00	0:00	0:00
9							0:00	0:00	0:00
10							0:00	0:00	0:00
11							0:00	0:00	0:00
12							0:00	0:00	0:00
13							0:00	0:00	0:00
14							0:00	0:00	0:00
15							0:00	0:00	0:00
16							0:00	0:00	0:00
17							0:00	0:00	0:00
18							0:00	0:00	0:00
19							0:00	0:00	0:00
20							0:00	0:00	0:00
21							0:00	0:00	0:00
22							0:00	0:00	0:00
23							0:00	0:00	0:00
24							0:00	0:00	0:00
25							0:00	0:00	0:00
26							0:00	0:00	0:00
27							0:00	0:00	0:00
28							0:00	0:00	0:00
29							0:00	0:00	0:00
30							0:00	0:00	0:00
31							0:00	0:00	0:00
						<b>Monthly Total</b>	0:00	0:00	0:00

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Apr-14			Total Day	Total Night	Total Day and Night	
			Start Time	Night Start	Night End				
1						0:00	0:00	0:00	
2						0:00	0:00	0:00	
3						0:00	0:00	0:00	
4						0:00	0:00	0:00	
5						0:00	0:00	0:00	
6						0:00	0:00	0:00	
7						0:00	0:00	0:00	
8						0:00	0:00	0:00	
9						0:00	0:00	0:00	
10						0:00	0:00	0:00	
11						0:00	0:00	0:00	
12						0:00	0:00	0:00	
13						0:00	0:00	0:00	
14						0:00	0:00	0:00	
15						0:00	0:00	0:00	
16						0:00	0:00	0:00	
17						0:00	0:00	0:00	
18						0:00	0:00	0:00	
19						0:00	0:00	0:00	
20						0:00	0:00	0:00	
21						0:00	0:00	0:00	
22						0:00	0:00	0:00	
23						0:00	0:00	0:00	
24						0:00	0:00	0:00	
25	12:00	14:15				2:15	0:00	2:15	
26						0:00	0:00	0:00	
27						0:00	0:00	0:00	
28						0:00	0:00	0:00	
29						0:00	0:00	0:00	
30						0:00	0:00	0:00	
						<b>Monthly Total</b>	2:15	0:00	2:15

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Start Time	End Time	May-14		Total Day	Total Night	Total Day and Night	
					Night Start	Night End				
1	20:45	22:00			22:00	23:07	1:15	1:07	2:22	
2							0:00	0:00	0:00	
3							0:00	0:00	0:00	
4							0:00	0:00	0:00	
5							0:00	0:00	0:00	
6	14:06	16:11	21:04	22:00	22:00	23:09	3:01	1:09	4:10	
7	19:08	21:09					2:01	0:00	2:01	
8							0:00	0:00	0:00	
9							0:00	0:00	0:00	
10							0:00	0:00	0:00	
11							0:00	0:00	0:00	
12							0:00	0:00	0:00	
13							0:00	0:00	0:00	
14							0:00	0:00	0:00	
15							0:00	0:00	0:00	
16							0:00	0:00	0:00	
17							0:00	0:00	0:00	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27	14:06	17:29					3:23	0:00	3:23	
28	19:48	22:00			22:00	23:27	2:12	1:27	3:39	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
31							0:00	0:00	0:00	
							<b>Monthly Total</b>	<b>11:52</b>	<b>3:43</b>	<b>15:35</b>

**OLF FLIGHT HOURS**

Day	Jun-14		Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night
	Start Time	End Time							
1							0:00	0:00	0:00
2							0:00	0:00	0:00
3	18:30	18:56					0:26	0:00	0:26
4	16:37	18:32					1:55	0:00	1:55
5	16:40	18:39					1:59	0:00	1:59
6							0:00	0:00	0:00
7							0:00	0:00	0:00
8							0:00	0:00	0:00
9							0:00	0:00	0:00
10							0:00	0:00	0:00
11							0:00	0:00	0:00
12							0:00	0:00	0:00
13							0:00	0:00	0:00
14							0:00	0:00	0:00
15							0:00	0:00	0:00
16							0:00	0:00	0:00
17	18:20	18:41					0:21	0:00	0:21
18							0:00	0:00	0:00
19	17:09	17:37					0:28	0:00	0:28
20	11:24	13:50					2:26	0:00	2:26
21							0:00	0:00	0:00
22							0:00	0:00	0:00
23	21:56	22:00			22:00	22:26	0:04	0:26	0:30
24	21:48	22:00			22:00	23:39	0:12	1:39	1:51
25	21:53	22:00			22:00	23:50	0:07	1:50	1:57
26					22:11	0:00	0:00	1:49	1:49
27					0:00	0:17	0:00	0:17	0:17
28							0:00	0:00	0:00
29							0:00	0:00	0:00
30					22:11	23:43	0:00	1:32	1:32
			<b>Monthly Total</b>				7:58	7:33	15:31

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Start Time	End Time	Jul-14		Total Day	Total Night	Total Day and Night	
					Night Start	Night End				
1							0:00	0:00	0:00	
2	11:58	13:56					1:58	0:00	1:58	
3							0:00	0:00	0:00	
4							0:00	0:00	0:00	
5							0:00	0:00	0:00	
6							0:00	0:00	0:00	
7	12:13	16:19					4:06	0:00	4:06	
8							0:00	0:00	0:00	
9							0:00	0:00	0:00	
10							0:00	0:00	0:00	
11							0:00	0:00	0:00	
12							0:00	0:00	0:00	
13							0:00	0:00	0:00	
14							0:00	0:00	0:00	
15							0:00	0:00	0:00	
16							0:00	0:00	0:00	
17							0:00	0:00	0:00	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27							0:00	0:00	0:00	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30	12:28	13:16					0:48	0:00	0:48	
31							0:00	0:00	0:00	
<b>Monthly Total</b>								6:52	0:00	6:52



**OLF FLIGHT HOURS**

Day	Start Time	End Time	Aug-14				Night Start	Night End	Total Day	Total Night	Total Day and Night
			Start Time	End Time	Start Time	End Time					
1								0:00	0:00	0:00	
2								0:00	0:00	0:00	
3								0:00	0:00	0:00	
4								0:00	0:00	0:00	
5								0:00	0:00	0:00	
6								0:00	0:00	0:00	
7								0:00	0:00	0:00	
8								0:00	0:00	0:00	
9								0:00	0:00	0:00	
10								0:00	0:00	0:00	
11	19:14	21:10						1:56	0:00	1:56	
12	15:43	17:36	19:12	22:00			22:00	4:41	2:00	6:41	
13							0:00	0:00	0:30	0:30	
14								0:00	0:00	0:00	
15								0:00	0:00	0:00	
16								0:00	0:00	0:00	
17								0:00	0:00	0:00	
18	8:29	11:38	20:13	22:00			22:00	4:56	1:59	6:55	
19	20:42	22:00					22:00	1:18	2:00	3:18	
20								0:00	0:00	0:00	
21	20:44	22:00					22:00	1:16	1:54	3:10	
22	11:33	14:38						3:05	0:00	3:05	
23								0:00	0:00	0:00	
24								0:00	0:00	0:00	
25	17:35	18:03	20:19	22:00			22:00	2:09	1:56	4:05	
26	15:25	17:24	20:22	21:04				2:41	0:00	2:41	
27	17:38	18:07	19:21	20:51				1:59	0:00	1:59	
28	13:35	14:09	15:01	15:36	16:22	17:01		1:48	0:00	1:48	
29								0:00	0:00	0:00	
30								0:00	0:00	0:00	
31								0:00	0:00	0:00	
							<b>Monthly Total</b>	25:49	10:19	36:08	

**OLF FLIGHT HOURS**

Sep-14

Day	Start Time	End Time	Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night	
1							0:00	0:00	0:00	
2							0:00	0:00	0:00	
3	15:46	16:17	16:36	17:08			1:03	0:00	1:03	
4	16:31	17:18					0:47	0:00	0:47	
5							0:00	0:00	0:00	
6							0:00	0:00	0:00	
7							0:00	0:00	0:00	
8							0:00	0:00	0:00	
9	15:36	17:34					1:58	0:00	1:58	
10	15:49	16:19					0:30	0:00	0:30	
11	15:39	17:21					1:42	0:00	1:42	
12							0:00	0:00	0:00	
13							0:00	0:00	0:00	
14							0:00	0:00	0:00	
15							0:00	0:00	0:00	
16							0:00	0:00	0:00	
17							0:00	0:00	0:00	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27							0:00	0:00	0:00	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
							<b>Monthly Total</b>	6:00	0:00	6:00

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**OLF FLIGHT HOURS**

Day	Oct-14						Night Start	Night End	Total Day	Total Night	Total Day and Night
	Start Time	End Time	Start Time	End Time	Start Time	End Time					
1								0:00	0:00	0:00	
2								0:00	0:00	0:00	
3	10:51	11:47	12:18	14:40	18:31	21:37		6:24	0:00	6:24	
4								0:00	0:00	0:00	
5								0:00	0:00	0:00	
6								0:00	0:00	0:00	
7								0:00	0:00	0:00	
8								0:00	0:00	0:00	
9								0:00	0:00	0:00	
10								0:00	0:00	0:00	
11								0:00	0:00	0:00	
12								0:00	0:00	0:00	
13								0:00	0:00	0:00	
14								0:00	0:00	0:00	
15								0:00	0:00	0:00	
16								0:00	0:00	0:00	
17	10:28	14:39						4:11	0:00	4:11	
18								0:00	0:00	0:00	
19								0:00	0:00	0:00	
20	18:30	19:15	19:48	22:00			22:00	2:57	0:05	3:02	
21								0:00	0:00	0:00	
22								0:00	0:00	0:00	
23								0:00	0:00	0:00	
24								0:00	0:00	0:00	
25								0:00	0:00	0:00	
26								0:00	0:00	0:00	
27								0:00	0:00	0:00	
28								0:00	0:00	0:00	
29								0:00	0:00	0:00	
30								0:00	0:00	0:00	
31								0:00	0:00	0:00	
							<b>Monthly Total</b>	<b>13:32</b>	<b>0:05</b>	<b>13:37</b>	

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Nov-14		Night Start	Night End	Total Day	Total Night	Total Day and Night
			Start Time	End Time					
1						0:00	0:00	0:00	
2						0:00	0:00	0:00	
3						0:00	0:00	0:00	
4						0:00	0:00	0:00	
5						0:00	0:00	0:00	
6						0:00	0:00	0:00	
7						0:00	0:00	0:00	
8						0:00	0:00	0:00	
9						0:00	0:00	0:00	
10						0:00	0:00	0:00	
11						0:00	0:00	0:00	
12						0:00	0:00	0:00	
13						0:00	0:00	0:00	
14						0:00	0:00	0:00	
15						0:00	0:00	0:00	
16						0:00	0:00	0:00	
17						0:00	0:00	0:00	
18						0:00	0:00	0:00	
19						0:00	0:00	0:00	
20						0:00	0:00	0:00	
21						0:00	0:00	0:00	
22						0:00	0:00	0:00	
23						0:00	0:00	0:00	
24						0:00	0:00	0:00	
25						0:00	0:00	0:00	
26						0:00	0:00	0:00	
27						0:00	0:00	0:00	
28						0:00	0:00	0:00	
29						0:00	0:00	0:00	
30						0:00	0:00	0:00	
					<b>Monthly Total</b>	0:00	0:00	0:00	

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Start Time	End Time	Dec-14		Total Day	Total Night	Total Day and Night
					Night Start	Night End			
1	11:30	14:00	17:00	19:15			4:45	0:00	4:45
2	11:45	14:00					2:15	0:00	2:15
3							0:00	0:00	0:00
4							0:00	0:00	0:00
5							0:00	0:00	0:00
6							0:00	0:00	0:00
7							0:00	0:00	0:00
8							0:00	0:00	0:00
9							0:00	0:00	0:00
10							0:00	0:00	0:00
11							0:00	0:00	0:00
12							0:00	0:00	0:00
13							0:00	0:00	0:00
14							0:00	0:00	0:00
15							0:00	0:00	0:00
16	15:15	16:00					0:45	0:00	0:45
17							0:00	0:00	0:00
18	9:46	13:05					3:19	0:00	3:19
19							0:00	0:00	0:00
20							0:00	0:00	0:00
21							0:00	0:00	0:00
22							0:00	0:00	0:00
23							0:00	0:00	0:00
24							0:00	0:00	0:00
25							0:00	0:00	0:00
26							0:00	0:00	0:00
27							0:00	0:00	0:00
28							0:00	0:00	0:00
29							0:00	0:00	0:00
30							0:00	0:00	0:00
31							0:00	0:00	0:00
<b>Monthly Total</b>							11:04	0:00	11:04

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Jan-15		Night Start	Night End	Total Day	Total Night	Total Day and Night
			Start Time	End Time					
1							0:00	0:00	0:00
2							0:00	0:00	0:00
3							0:00	0:00	0:00
4							0:00	0:00	0:00
5							0:00	0:00	0:00
6	15:03	16:03					1:00	0:00	1:00
7							0:00	0:00	0:00
8	15:04	15:47					0:43	0:00	0:43
9							0:00	0:00	0:00
10							0:00	0:00	0:00
11							0:00	0:00	0:00
12							0:00	0:00	0:00
13							0:00	0:00	0:00
14	15:05	15:44	17:52	19:30			2:17	0:00	2:17
15							0:00	0:00	0:00
16							0:00	0:00	0:00
17							0:00	0:00	0:00
18							0:00	0:00	0:00
19							0:00	0:00	0:00
20							0:00	0:00	0:00
21							0:00	0:00	0:00
22							0:00	0:00	0:00
23							0:00	0:00	0:00
24							0:00	0:00	0:00
25							0:00	0:00	0:00
26							0:00	0:00	0:00
27							0:00	0:00	0:00
28							0:00	0:00	0:00
29							0:00	0:00	0:00
30							0:00	0:00	0:00
31							0:00	0:00	0:00
<b>Monthly Total</b>							4:00	0:00	4:00

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Feb-15				Total Day	Total Night	Total Day and Night
			Start Time	End Time	Start Time	Night End			
1						0:00	0:00	0:00	
2						0:00	0:00	0:00	
3						0:00	0:00	0:00	
4						0:00	0:00	0:00	
5						0:00	0:00	0:00	
6						0:00	0:00	0:00	
7						0:00	0:00	0:00	
8						0:00	0:00	0:00	
9						0:00	0:00	0:00	
10						0:00	0:00	0:00	
11						0:00	0:00	0:00	
12						0:00	0:00	0:00	
13						0:00	0:00	0:00	
14						0:00	0:00	0:00	
15						0:00	0:00	0:00	
16						0:00	0:00	0:00	
17						0:00	0:00	0:00	
18						0:00	0:00	0:00	
19						0:00	0:00	0:00	
20						0:00	0:00	0:00	
21						0:00	0:00	0:00	
22						0:00	0:00	0:00	
23						0:00	0:00	0:00	
24						0:00	0:00	0:00	
25						0:00	0:00	0:00	
26						0:00	0:00	0:00	
27						0:00	0:00	0:00	
28						0:00	0:00	0:00	
					<b>Monthly Total</b>	0:00	0:00	0:00	

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OLF FLIGHT HOURS

Day	Start Time	End Time	Start Time	End Time	Start Time	End Time	Start Time	End Time	Start Time	End Time	Flight Start	Flight End	Total Day	Total Night	Total Day and Night	
1													0:00	0:00	0:00	
2													0:00	0:00	0:00	
3													0:00	0:00	0:00	
4													0:00	0:00	0:00	
5													0:00	0:00	0:00	
6													0:00	0:00	0:00	
7													0:00	0:00	0:00	
8													0:00	0:00	0:00	
9													0:00	0:00	0:00	
10													0:00	0:00	0:00	
11													0:00	0:00	0:00	
12													0:00	0:00	0:00	
13	11:00	11:45	12:30	13:15									1:30	0:00	1:30	
14													0:00	0:00	0:00	
15													0:00	0:00	0:00	
16	13:30	14:05	14:24	15:38	15:44	16:28	17:35	21:35					6:33	0:00	6:33	
17	10:10	13:45	13:55	14:30	15:16	15:59	19:36	20:09	20:58	21:30			5:58	0:00	5:58	
18	20:00	20:50											0:50	0:00	0:50	
19	19:32	21:48											2:16	0:00	2:16	
20													0:00	0:00	0:00	
21													0:00	0:00	0:00	
22													0:00	0:00	0:00	
23													0:00	0:00	0:00	
24	10:30	14:00											3:30	0:00	3:30	
25													0:00	0:00	0:00	
26	18:12	21:26											3:14	0:00	3:14	
27	11:00	14:42											3:42	0:00	3:42	
28													0:00	0:00	0:00	
29													0:00	0:00	0:00	
30	18:10	19:31											1:21	0:00	1:21	
31	10:57	14:10											3:13	0:00	3:13	
													Monthly Total	32:07	0:00	32:07



**OLF FLIGHT HOURS**

Apr-15										
Day	Start Time	End Time	Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night	
1	18:10	21:30					3:20	0:00	3:20	
2	11:21	14:23	18:00	21:28			6:30	0:00	6:30	
3							0:00	0:00	0:00	
4							0:00	0:00	0:00	
5							0:00	0:00	0:00	
6	18:06	21:40					3:34	0:00	3:34	
7							0:00	0:00	0:00	
8	10:40	14:09					3:29	0:00	3:29	
9	13:40	14:30	18:50	19:33			1:33	0:00	1:33	
10							0:00	0:00	0:00	
11							0:00	0:00	0:00	
12							0:00	0:00	0:00	
13							0:00	0:00	0:00	
14							0:00	0:00	0:00	
15							0:00	0:00	0:00	
16	19:15	22:00			22:00	22:57	2:45	0:57	3:42	
17							0:00	0:00	0:00	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27	19:04	20:46					1:42	0:00	1:42	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
							<b>Monthly Total</b>	22:53	0:57	23:50

Annual Total			
2014			
Month	Day	Night	Total
January	6:59	0:00	6:59
February	0:00	0:00	0:00
March	0:00	0:00	0:00
April	2:15	0:00	2:15
May	11:52	3:43	15:35
June	7:58	7:33	15:31
July	6:52	0:00	6:52
August	25:49	10:19	12:08
September	6:00	0:00	6:00
October	13:32	0:05	13:37
November	0:00	0:00	0:00
December	11:04	0:00	11:04
Totals	92:21	21:40	114:01

Annual Total			
2015			
Month	Day	Night	Total
January	4:00	0:00	4:00
February	0:00	0:00	0:00
March	32:07	0:00	32:07
April	22:53	0:57	23:50
Totals	59:00	0:57	59:57

State of Washington

# 2014 Population Trends

**Forecasting & Research Division**  
Office of Financial Management  
November 2014



Table 4 *continued***Populations of Cities, Towns, and Counties: April 1, 2010 to April 1, 2014**

<b>County Municipality</b>	<b>Census 2010</b>	<b>Estimate 2011</b>	<b>Estimate 2012</b>	<b>Estimate 2013</b>	<b>Estimate 2014</b>
<b>Douglas</b>	<b>38,431</b>	<b>38,650</b>	<b>38,900</b>	<b>39,280</b>	<b>39,700</b>
Unincorporated	20,399	20,590	20,760	21,060	21,430
Incorporated	18,032	18,060	18,140	18,220	18,270
Bridgeport	2,409	2,405	2,415	2,425	2,445
Coulee Dam <i>part</i>	187	185	185	185	185
East Wenatchee	13,190	13,220	13,280	13,350	13,370
Mansfield	320	320	325	325	325
Rock Island	788	790	790	790	790
Waterville	1,138	1,140	1,145	1,145	1,155
<b>Ferry</b>	<b>7,551</b>	<b>7,600</b>	<b>7,650</b>	<b>7,650</b>	<b>7,660</b>
Unincorporated	6,478	6,520	6,565	6,555	6,560
Incorporated	1,073	1,080	1,085	1,095	1,100
Republic	1,073	1,080	1,085	1,095	1,100
<b>Franklin</b>	<b>78,163</b>	<b>80,500</b>	<b>82,500</b>	<b>84,800</b>	<b>86,600</b>
Unincorporated	13,491	13,665	13,820	13,160	12,820
Incorporated	64,672	66,835	68,680	71,640	73,780
Connell	4,209	5,150	5,320	5,350	5,330
Kahlotus	193	190	195	195	185
Mesa	489	495	495	495	495
Pasco	59,781	61,000	62,670	65,600	67,770
<b>Garfield</b>	<b>2,266</b>	<b>2,250</b>	<b>2,250</b>	<b>2,250</b>	<b>2,240</b>
Unincorporated	841	835	840	850	845
Incorporated	1,425	1,415	1,410	1,400	1,395
Pomeroy	1,425	1,415	1,410	1,400	1,395
<b>Grant</b>	<b>89,120</b>	<b>90,100</b>	<b>91,000</b>	<b>91,800</b>	<b>92,900</b>
Unincorporated	40,134	40,395	40,790	40,956	41,470
Incorporated	48,986	49,705	50,210	50,844	51,430
Coulee City	562	565	560	570	565
Coulee Dam <i>part</i>	0	0	0	0	0
Electric City	968	1,065	995	1,010	1,010
Ephrata	7,664	7,690	7,750	7,870	7,930
George	501	690	700	720	720
Grand Coulee	988	1,020	1,035	1,045	1,050
Hartline	151	150	150	155	155
Krupp	48	50	50	50	50
Mattawa	4,437	4,460	4,495	4,540	4,460
Moses Lake	20,366	20,640	20,950	21,250	21,600
Quincy	6,750	6,815	6,945	7,000	7,235
Royal City	2,140	2,150	2,160	2,190	2,210
Soap Lake	1,514	1,515	1,520	1,530	1,530
Warden	2,692	2,690	2,695	2,705	2,710
Wilson Creek	205	205	205	209+	205
<b>Grays Harbor</b>	<b>72,797</b>	<b>72,900</b>	<b>73,150</b>	<b>73,200</b>	<b>73,300</b>
Unincorporated	28,438	28,555	28,610	28,615	28,635
Incorporated	44,359	44,345	44,540	44,585	44,665
Aberdeen	16,896	16,870	16,890	16,860	16,850
Cosmopolis	1,649	1,645	1,640	1,650	1,645
Elma	3,107	3,115	3,110	3,115	3,130
Hoquiam	8,726	8,650	8,655	8,620	8,625
McCleary	1,653	1,655	1,655	1,655	1,660
Montesano	3,976	4,010	4,050	4,070	4,075
Oakville	684	685	690	690	690
Ocean Shores	5,569	5,615	5,745	5,815	5,880
Westport	2,099	2,100	2,105	2,110	2,110
<b>Island</b>	<b>78,506</b>	<b>78,800</b>	<b>79,350</b>	<b>79,700</b>	<b>80,000</b>
Unincorporated	53,565	53,700	54,215	54,665	55,090
Incorporated	24,941	25,100	25,135	25,035	24,910
Coupeville	1,831	1,855	1,880	1,890	1,895
Langley	1,035	1,045	1,055	1,065	1,075
Oak Harbor	22,075	22,200	22,200	22,080	21,940



# news·times

VOLUME 75

Oak Harbor and Coupeville, Washington, Thursday, January 26, 1967

NUMBER 19

## Navy Works On Coupeville Strip

The navy conducted flight operations on Coupeville's airstrip January 5 for the first time in several years.

Three A6A Intruders from Heavy Attack Squadron 123 logged 42 "bounces" and established the A6A flight pattern for field carrier landing practice. More work is being done to equip the airstrip for carrier practice "touch and go" landings. The navy expects to have the field in full operations for day and night landings by July 1.

The central Whidbey field, almost completely abandoned by the

navy 3½ years ago, is being activated to ease the crowded traffic pattern at Ault Field brought on by the addition of A6A Intruder squadrons. Intruders and A3B twin jet Skywarriors will use the Coupeville strip for day and night landings.

Navy crews cleaned and checked the Coupeville runways last December. After the runway is painted, the field can accommodate day-time landings by Intruder aircraft.

The larger and heavier Skywar-

riors cannot use the field until arresting gear is installed. This gear should be in place about mid-February.

Installation of runway lights is expected in March to allow night landings. Other equipment for full-time operations should be installed by July. At present, the navy does not plan to base personnel at Coupeville overnight.

The navy stated that 80,000 landings at Coupeville are predicted for fiscal year 1968, with a yearly average after that of about 100,000 landings.



WHIDBEY

# news·times

Appendix E-2

KUNJO0011

VOLUME 75

Oak Harbor and Coupeville, Washington, Thursday, August 3, 1967

NUMBER 46

## Coupeville Airstrip Readied For Operations

The Coupeville airstrip is nearly ready for touch and go landings, and these familiarization and carrier landing practices by the navy are expected to begin early this month.

The navy reported last Thursday that it was resealing the joints of the field, and that the strip could

actually be used now at night. Full-time day and night practices are expected in September.

The Coupeville strip is being reactivated by the navy after it was almost completely abandoned several years ago. Opening of the mid-Whidbey field will take a load off Ault Field where the airways

have become crowded.

A majority of the pilots practicing at Coupeville will be flying the A6A Intruder, the navy's all-weather medium attack bomber which has had an impressive record of performance in Vietnam.

All landings at Coupeville will be the touch and go type. The

planes will come down, touch field and then take off.

Pilots will begin their training with familiarization type landings to get used to the approach. Then, they will go to carrier landing practices.

Most familiarization landings are accomplished with an instructor in the plane and radioman on the ground both monitoring the pilot. For carrier practices, the Coupeville strip will have an outline of a carrier deck on the runway and lights that will outline the dimensions of a carrier deck for night landings.

The Coupeville strip will have emergency arresting gear just in case planes are forced to land. It is expected that planes will only land in emergencies.

The field will also have radios at both ends of the runway and an optical landing system indicating the proper glide slope for carrier landings.



# WHIDBEY news·times

AE 76

Oak Harbor and Coupeville, Washington, Thursday September 21, 1967

NUMBER 1

## Coupeville Flights Curtailed

Flight operations until early morning hours by Whidbey Island Naval Air Station jets at the Coupeville field produced some unhappy people in the Coupeville area this past week.

Relief is immediate, however, according to Captain Homer (Ken) Cooley, Commander Fleet Air, Whidbey operations officer. It is anticipated that the Coupeville field will not be used at night for the next two weeks, and thereafter

no later than midnight.

The Coupeville field was recently reactivated to handle increased training requirements for the A6A medium jet attack squadrons and the A3B heavy jet attack-aerial refueler squadrons.

Because several squadron units are preparing to deploy, the number of field carrier landing practice "bounces" at the field and at Ault Field was abnormally high last week.

Referring to the amount of Coupeville air traffic last week, Captain Cooley said, "Most of the time — for most of the year, as a matter of fact — we can accommodate this night training practice at Ault Field. However, at times there is a heavy concentration of flying which must be done just prior to units deploying to aircraft carriers.

"Such was the case last week. Several units are preparing to deploy and the number of flights scheduled was too much to handle at Ault Field; therefore the overload was flown at Coupeville field."

Commander Fleet Air, Whidbey's policy dictates using Coupeville field for night operations only when traffic is so heavy that it cannot be accommodated at Ault Field.

Training operations lasted until morning hours at Coupeville two nights last week, but continued that late five nights at Ault Field.

Captain Cooley added, "You can be sure that flights will end earlier as we go into fall and winter because the increased hours of darkness will enable us to begin flying earlier."

# WHIDBEY NEWS-TIMES

Serving North and Central Whidbey Island

WEDNESDAY, NOVEMBER 4, 1987

VOLUME 96, NUMBER 11

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Seattle attorney Michael Gendler (at left) addresses the WISE crowd, last week, while (at right) Bill Skubi, WISE publicist and spokesperson, makes some additional points.

## Anti-noise group launches three-prong attack

By Mary Kay Dooody  
Staff reporter

They may be new, but they're organized.

From a handful of noise-zone residents meeting in Bruce Bardwell's living room on Morris Road this summer, Whidbey Islanders for a Sound Environment (WISE) has grown into a tax-exempt nonprofit corporation with about 100 dues-paying members and a mailing list of more than 300 households.

WISE has launched an aggressive membership drive and a campaign for contributions to pay for litigation against the Navy — the legal prong of the group's three-pronged effort to "restore liveability" on Central Whidbey, where Navy jet operations have increased 250 percent over the past two years.

More than 400 people attended a WISE meeting last Tuesday, when plans for legal and other action were discussed.

"You are one of the best-organized groups I've seen," Seattle attorney Michael W. Gendler told the crowd gathered in the Coupeville High School gym. "The one thing you do have going for you is numbers."

Gendler, who has fought expansion of Pease Field and litigated other noise cases, said action forcing preparation

of an environmental impact statement on the Navy's Air Installation Compatible Use Zones (AICUZ) could be taken under the National Environmental Protection Act (NEPA).

Invited by Coupeville attorney Ken Pickard to address the WISE meeting, Gendler also discussed possible inverse condemnation litigation claiming devaluation of residential property by jet noise.

WISE should expect litigation to cost anywhere between \$5,000 and \$30,000, he said.

The group has not yet retained a lawyer, but WISE legal committee chairman Will Jones said he recommends "moving right out" with a legal action plan, and hiring a lawyer before the end of November.

With the help of volunteers, legal research would be completed by the end of December and a lawsuit filed by the end of February, if the group acts according to Jones' 130-day plan of action.

Jones said the three prongs of the WISE's approach are direct negotiations with the Navy, political action and litigation.

Jones said the government might "recognize the problem and start doing something about it" when WISE gets "all three of those approaches going in parallel."

Tom Punch, WISE's Navy liaison committee chairman, said direct negotiations were "going at a snail's pace" but that he thought they could be productive. Punch, a Coupeville Realtor, asked noise zone residents to let him know how many flights per day they "can live with" for purposes of negotiating.

Political action committee chairman Dennis Argent said the state's congressional delegation reported receiving "stacks of letters," and he urged members to keep writing their elected representatives.

If direct negotiation and political action aren't enough, said Jones, a \$100-million lawsuit "might get the attention of the government." He said his rough estimate was based on an average \$25,000 loss of property value, due to jet noise and accident potential, on some 4,000 lots in and around the Navy's Coupeville Outlying Field (OLF).

To save on legal fees, Jones said, volunteer members of his committee could do much of the research on such things as the number of properties adversely affected, and how their owners use them.

Jones is a member of the Coupeville Town Council, which in April unanimously adopted a resolution against Navy noise and accident-

potential zones in town. NAS Whidbey commanding officer Capt. Dave Williams wrote the town in July saying the Navy can't comply with the resolution, and urging town officials to cooperate in AICUZ planning efforts.

Under the WISE plan, even as litigation would proceed, said Jones, attempts to "establish a dialogue with the Navy" for direct negotiations would continue, and pressure would continue to be put on local, state and federal elected officials to help solve the problem.

The problem WISE cites is that operations have increased drastically and are expected to continue to increase at the Coupeville OLF, and residents of some areas — such as Admiral's Cove — are regularly subjected to average noise levels of Ldn 75 to 85 or higher.

Ldn is a measure of the day-night average sound level in decibels, with night-time noise weighted an extra 10 decibels because of its greater intrusiveness.

In its Air Installation Compatible Use Study (AICUZ), the Navy uses 65 Ldn as the lower "threshold of adverse noise effects."

Gendler said the scale is logarithmic, so that 75 Ldn, for example, is 10 times noisier than 65 Ldn — and 85 Ldn

(Please turn to page 2)



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## Anti-noise group launches three prong attack

(Continued from page 1)  
100 times noisier than 65 Ldn.  
Advising the WISE group that a NEPA suit could force the Navy to do an environmental impact statement on its AICUZ plan, which covers developed as well as undeveloped areas, Gendler said studies have shown that noise levels above Ldn 65 can cause hearing loss, and that it's cumulative.

"Every time these planes fly over, you are losing a little bit of your hearing that you're not going to get back," said Gendler, adding that noise levels capable of causing hearing loss can also cause irritation, sleep interruption, nervous disorders and "even mental illness."

He advised people to keep records of unusual events — such as when planes fly out of their prescribed patterns, or dump fuel. Phoning in complaints to NAS Whidbey shouldn't be looked at as futile, but as important documentation, he said.

Gendler even recommended noise zone residents tape record the jets' noise for possible demonstration for a jury if a lawsuit should go to trial. A recording of conversation being drowned by the roar of jets is more dramatic than statements to that effect, he said.

Because continued use of OLF is essential to NAS Whidbey's mission, Navy officials say, the county and cities of Coupeville and Oak Harbor should change the zoning of residential land under the flight patterns for more compatible uses such as agriculture, forest management or mining.

That "down-zoning," Gendler said, "is the Navy's way of shifting the costs of their noise from them to you."

WISE members have said that some people in the noise zone want to move because they can't stand the noise from the stepped-up operations at OLF, but that it's hard to find buyers because of the noise.

But WISE president Bruce Bardwell told the group last week that he finally sold his house in the noise zone, on Morris Road, to a couple from New Jersey — and that he's made an offer on property in Race Lagoon.

Bardwell said he knows Race Lagoon is also in a noise zone but that he was confident that WISE, county government and the Navy would somehow resolve the conflict between residential development and the Navy's use of the OLF property.

"We're going to get this thing worked out so that all of us will have a liveable environment," said Bardwell.

In an information sheet distributed by WISE, the group asks people to "think beyond the noise problem to the issue of public health and safety. Remember, six NAS Whidbey A-6 aircraft have crashed in the last 12 months."

None of those tragedies, involving A-6 Intruder attack bombers occurred on the island, but in December 1982 an EA-6B Prowler — a tactical electronics-jamming aircraft — crashed in the woods near Coupeville OLF, killing its crew of two naval officers. No one else was hurt.

Navy officials have stressed the importance of keeping residential development from encroaching into accident-potential zones and have not ruled out the possibility of buying development rights, but no such compensation has been reported budgeted.

Other measures the Navy seeks are requirements for noise attenuation in construction, and for full disclosure of noise levels and accident-potential ratings to prospective land purchasers.

WISE says those measures are too little too late in already-developed areas.

In Admiral's Cove, for example, there are about 150 houses, said neighborhood resource committee chairmen Forrest and Ann Davis. Mr. Davis has volunteered the use of his home computer for WISE research and newsletter production, and Mrs. Davis has organized a team of volunteers who are canvassing neighborhoods drumming up members and supporters.

After last Tuesday's meeting was adjourned, knots of spectators watched a videotape of a documentary on a similar conflict near NAS Fallon in Nevada that was aired this summer.

"The same thing went on there," said Mary Argent, who taped the show. "The residents protesting the noise were called anti-Navy and un-American."

Then-commanding officer of NAS Fallon Capt. Dick Toft was interviewed along with several residents of Dixie Valley, where litigation over jet noise, including sonic booms, ended with the Navy paying to relocate several families.

Toft, who is now Rear Admiral Fred Metz's chief of staff for the Pacific Air Wing, attended last week's WISE meeting, but didn't address the group.

WISE vice-president Jim Burns said Toft introduced himself and they had a brief conversation after the meeting.

# County supported Navy during '87 controversy

By Jim Thomsen  
Staff reporter

Nearly five years ago, supporters of the Navy and opponents of Navy aircraft noise had a showdown before the Island County Board of Commissioners.

Pressed to take a stand, commissioners Dick Caldwell, Dwain Colby and Gordon Koetje — the same who will preside at a public hearing Monday on the issue — lent their unanimous,

though somewhat reluctant, support for the Navy.

The Navy was looking at siting new attack squadrons at one of their west coast naval air stations — either on Whidbey Island or at Lemoore, Calif.

The Navy's decision hinged, in part, on the support of the local community for such an expansion here.

A vital part of that support was an on-the-record, unanimous endorsement of continued operation of the Navy's carrier-

landing field at Coupeville by the county commissioners.

Base supporters and aircraft noise opponents, including the then-newly formed Whidbey Islanders For A Sound Environment, prepared high-profile campaigns aimed at the commissioners' endorsement.

While Caldwell and Koetje had indicated they were inclined to support the Navy, Colby was leaning the other way.

Colby had written a confiden-

tial memo to former NAS Whidbey Cmdr. Dave Williams earlier. In the memo, Colby proposed the county ban new residential development around Ault Field in exchange for Navy abandonment of OLF Coupeville.

Pressed for his views during the public hearing, however, Colby said: "I don't think there's any question but that we all do (support the Navy)."

Williams and other Navy officials pledged to continue study-

ing feasible alternatives to OLF Coupeville and implemented Air Installation Compatible Use Zoning (AICUZ) guidelines.

WISE attorney Ken Pickard later said his group was contemplating a conflict-of-interest lawsuit against Koetje because he owns land in the disputed zones. No action was ever filed.

NAS Whidbey received the new squadrons, and the number of flights within the noise zones more than doubled from 13,000 annually to more than 30,000.

## WISE testifies in San Francisco; suggests skepticism in numbers

By CRAIG DENNIS  
*Publisher*

SAN FRANCISCO - James Burns, president of Whidbey Islanders for a Sound Environment (WISE), told the Base Closure and Realignment Commission to review with skepticism numbers supplied in support of keeping NAS Whidbey open.

Burns was speaking for his organization as well as three other regional environmental groups concerned with noise encroachment in north Puget Sound.

WISE was allotted five minutes by the local task force midway through their 75-minute presentation.

"I'm not terribly happy to be sitting here in the camp of the enemy," said Burns. "Our group is not opposed to the Navy on the island."

But he said his group believes the Navy has not done an adequate job of addressing their environmental concerns.

Burns told the commission about last week's WISE membership vote in favor of the Navy's decision to close NAS Whidbey.

"We are not against the

Navy," he said. "We are for solving some problems."

He said his group believes NAS Whidbey is too small for adequate training operations. In support, he cited that NAS Whidbey has approximately 5,000 acres compared to 18,000 owned by the Navy at LeMoore, Calif., the proposed receiving base for the A-6 and EA-6B communities.

**EDITOR'S NOTE:** Craig Dennis, publisher of the Whidbey News-Times, is a member of the Save NAS Whidbey Task Force. He prepared the reports from San Francisco.

Appendix E-7



**APPENDIX F: 2016-06-25 E-MAIL FROM CAPTAIN GEOFFREY MOORE, USN**

**From:** Moore, Geoffrey C CAPT CO NAS Whidbey Is, N00  
**To:** [Helen.PriceJohnson](#)  
**Subject:** RE: this is madness -  
**Date:** Saturday, June 25, 2016 8:40:21 AM  
**Attachments:** [smime.p7s](#)

---

Commissioner Johnson,

It's been a busy week prepping for our open house and we are fighting a stomach bug in our family, so apologize for the delay in my response. Finally, in the calm before the open house starts, I have an opportunity to address correspondence.

Mayor Hughes discussed this farm with me as well, and I have listened to Mrs. Bartlett's comments to the Island Board of Health. I review our noise complaints daily so I can understand the impact on our local communities, so I appreciate you forwarding this e-mail.

As mentioned at our Tuesday discussion, there was acknowledgement that our nighttime FCLP requirements would most likely cause sleep disturbance of residents around OLF Coupeville. Coinciding schedules of two carriers has forced us to use both Ault Field at NAS Whidbey and OLF Coupeville this last week to get our pilots the necessary training prior to conducting at sea operations. Meeting the requirements of two squadrons did not allow us to alternate between the fields each night to provide some relief to the citizens who live near each respective airport. The timing with Summer Solstice was truly unfortunate. We have additional operations next week, but currently only plan one night at OLF Coupeville and four nights at Ault Field. The night operations at OLF Coupeville should be complete by midnight.

I discussed the downwind altitude with my operations officer after our discussion on Tuesday, and confirmed that the daytime altitude of 800 feet and the nighttime altitude of 1,200 feet has not changed in as far back as they have been stationed at NAS Whidbey Island. These altitudes are the same ones that we fly at the carrier, and with the precision requirements of that difficult task, the best training is achieved when we can duplicate the sight picture of the same altitude as the carrier pattern.

As of this morning, we have flown 3,906 operations of our NEPA allowance of 6,120 operations. That translates into 56 hours and 7 minutes total flight time at OLF Coupeville since January 1st; 5 hours and 14 minutes of that total has been flown between 10 p.m. and midnight. (~four hours this last week, and a little over an hour in May.) We continue to closely monitor our utilization of OLF Coupeville, and I look forward to working with you, the Island County Commissioners, and other elected leaders in our local area to be able to meet our local training requirements with the least impact possible to our surrounding areas.

Once again, thank you for the meeting invitation last week as well as the continued dialog.

Sincerely,

CAPT Geoff 'Jefe' Moore  
Commanding Officer, NAS Whidbey  
Island Geoffrey.Moore@navy.mil  
Office Phone: 360.257.2037

"For OFFICIAL USE ONLY (FOUO) - This email and attached files may contain Privacy Sensitive information or Law Enforcement Sensitive Information. Any misuse or unauthorized disclosure may result in both civil and criminal penalties. If you received this document in error, please notify me at the above phone number and destroy the document immediately in accordance with Privacy Act procedures."

-----Original Message-----

From: Helen Price Johnson [mailto:H.Price\_Johnson@co.island.wa.us]

Sent: Wednesday, June 22, 2016 5:03 PM

To: Moore, Geoffrey C CAPT CO NAS Whidbey Is, N00

Cc: Pam Dill

Subject: [Non-DoD Source] FW: this is madness -

Capt. Moore, I appreciated your presence and presentation at today's COG meeting and our conversation yesterday. Below is a common message from one of the Central Whidbey farmers. We spoke yesterday about the difference when pilots are lower and how it intensifies the impact for those beneath the flight path. You said there is a standard range, and I ask if there is any way the pilots can pull up a bit higher in that range as they circle over the workers there, it would be greatly appreciated.

Thanks,

Helen Price Johnson  
 Island County Commissioner, District 1  
 District1@co.island.wa.us <mailto:District1@co.island.wa.us>  
 PO Box 5000  
 Coupeville, WA 98239  
 (360)679-7354 office  
 (360)632-1168 mobile  
 "Quality services for a quality life"

From: Rosehip Farm & Garden [mailto:rosehip@whidbey.net]

Sent: Wednesday, June 22, 2016 4:27 PM

To: zz district1 <district1@co.island.wa.us>

Subject: this is madness -

Dear Helen

This is complete madness. The planes are coming in so low and are so loud. Flew till Midnight last night and are supposed to again tonight and tomorrow. Right now they are just above the barn and trees- barely. You have no idea the effect. We got about 4 hours of sleep last night. Earplugs on in my bed and still too loud. This is NOT okay. My windows are rattling and it is difficult to work. Something must be done. Really different than at OLF as the acceleration and after-burners multiply the effect.

Is the board of health going to do anything? The commissioners? I really wish you and the health commissioners could come hear this first hand. You would get our distress.

I'm sure you are tired of hearing from me but our lives are a living hell. They passed over every 20 seconds last night for over 2 hours. More expected. It has to stop. What can we do?

Sincerely,

Rosehip Farm & Garden  
 [REDACTED]  
 Coupeville, WA 98239

www.rosehipfarmandgarden.com 360-678-3577

## APPENDIX G: COER WANTS TO GET RID OF NASWI

Captain Geoffrey Moore, CO NAS Whidbey Island, "Why would it be in my interest to talk to someone who wants to get rid of me?"  
(21 April 2016 Whidbey News-Times, "The man in charge: Moore settles in as base commander")

Captain Moore, you're right. Here's almost if not two pages of *why* so strike back with Scenario A and kick the COER *enemy* out of ~~Kuwait~~ OLF:

**From:** [REDACTED]

**To:** Helen Price Johnson;Jill Johnson;mayor@townofcoupeville.org; justin burnett;Murray, Sheila A CIV NavyRegion NW, N00P;Congressman Rick Larsen;Marilyn Clay

**Subject:** More thoughts from Slovenia

**Date:** Wednesday, May 15, 2013 11:30:41 PM

Oh, I forgot about the hundreds of homes and thousands living in APZ1, I.e. Crash zone 1. The collusion of local government with the Feds and military is sinful. Don't make crash zones at OLF, too many people will complain, God, we might lose the oozing of pork grease at NASWI on paydays twice a month, just let people build and try to live in what would have been the crash zones. Way too late for APZs now. And Island County's fraud in taking a fourteen million dollar grant to build the bus barn in what would be APZ1. I'm sure the agency, had they known, would not have granted the money, pork,pork, to build in a crash zone. Maybe they should be notified so they can recover that money back from the County. [REDACTED]

[REDACTED]  
No the military is not being a good neighbor.the military is a guest and this guest is wearing out its welcomeby thier actions.[Reply](#) · [Like](#) · 15 hours ago

[REDACTED]  
\_ · Top Commenter · [Coupeville, Washington](#) The Navy is not even trying despite their rhetoric. They want to train in the darkness so they pick the shortest days of the year in northern latitudes to train. What insensitivity, or are they really that stupid? Train in the winter when it gets dark at 4:30 p.m. and they can do all of their flying at NASWI. They are the biggest bully in the world. [Reply](#) · [Like](#) · [Follow Post](#)



STOP DESTROYING COUPEVILLE. ... we heard the same hollow words during vietnam "that we had to destroy it so we could protect it's freedoms" .. this jewel of the NW geography and historical seaport heritage are being destroyed by the same mindless decision makers. Thousands of my community members have devoted years of environmental good stewardship, celebration and preservation of a unique territorial seaport/ farming community. YOU DESTROY any peace and solitude that my community works hard to achieve. YOU are the ... ""HELL FROM THE HEAVENS ABOVE".... YOU poison the environment physically, economically and socially. GO TO LEMORE. .. GO SOMEPLACE WHERE YOU ARE NOT PHYSICALLY THREATENJNG THE CIVILIANS ON THE GROUND. This is an island with limited resources, YOU have far exceeded those resources ...  
Coupeville, WA

It is time for you "representatives" to get some balls and take the death machine on on this issue, quit licking their jackboots! Buck up! You know it is wrong for them ilitary to abuse us with this toxic noise that is ruining our lives and property values, so act in accordance with what you know to be true instead of like worried, timid leaders, afraid of the military, afraid of losing the federal pork it delivers hereon pay days. Get some courage, let the people be heard. Sitting at a table "talking" is not going to solve anything.



APPENDIX H: AVGEEKJOE PRODUCTIONS FACEBOOK AD REQUESTING PRO-OLF COMMENTS

The screenshot shows a Facebook post from 'AvgeekJoe Productions' dated November 18 at 11:12pm. The post text asks for support for Naval Outlying Field Coupeville and requests a pro-OLF comment to a specific URL. The post includes a photo of an EA-18G Growler aircraft. Below the photo is a link to an 'Environmental Impact Statement for the EA-18G Growler Airfield Operations' with a 'Sign Up' button. The analytics panel on the right shows 6,401 people reached, 178 reactions, 45 comments, 41 shares, and 500 post clicks. The negative feedback section shows 2 hidden posts and 0 reports as spam.

6,401 People Reached		
178 Reactions, Comments & Shares		
89 Like	57 On Post	32 On Shares
2 Love	2 On Post	0 On Shares
1 Wow	0 On Post	1 On Shares
45 Comments	41 On Post	4 On Shares
41 Shares	40 On Post	1 On Shares
500 Post Clicks		
0 Photo Views	394 Link Clicks	106 Other Clicks
NEGATIVE FEEDBACK		
2 Hide Post	0 Hide All Posts	
0 Report as Spam	0 Unlike Page	

\*Other Clicks being clicks on the title or the weblink in the post.

Now, US Navy, you are welcome. Now PLEASE use the AFTERBURNERS if you would so kindly PLEASE use the AFTERBURNERS PLEASE.

Sedro Woolley, WA 98284

- 1.a. Thank You
- 2.m. Record of Decision/Preferred Alternative

Uh, we who got friends and crushes in VAQ-129 want Option A. Max out OLF use please, stop gambling with Vikings' lives to appease COER.

## 1.a. Thank You

Sedro Woolley, WA 98284

I am calling on every friend I know, every favor I got to activate themselves and submit a comment here supporting using OLF Coupeville to the MAXIMUM. What is more important - COER or my friend Christine learning to fly? What the hell? You people better not give up the OLF, don't you dare do it. That OLF is there for citizens of AMERICA not sovereign citizens of Ebey's Reserve. That OLF is worth MY LIFE, which I am WILLING TO GIVE as long as OLF is VITAL to keeping every Growler in the air. Now, I STAND for the flag and the anthem. COER and their idol Kolin Krapernick sit for the flag and the anthem. Garrett Newkook, COER spokesman has called our troops terrorists and yet we're about to put our fannies away from our families to accommodate a bunch of COERs who can't even say, "THANK YOU" to the US Navy for this study. Not even a "THANK YOU". Oh and this consulting party horses--t of no pro-OLF folks or groups? What a dangerous, potentially DEADLY mistake. We need to draw a line in the sand. A line. Make a damn decision that isn't accommodating COER. COER ain't bringing you presents in 2013 like I did, in 2014 like I tried to and if I could in 2016. Just wanted to remind you all of that, you know. G\*d Bless and let's go BEAT COER together! USA!

1.a. Thank You

Sedro Woolley, WA 98284

I fully endorse the Boeing EA-18G Growler and demand you provide ample security to any public gatherings about this. COER is well known for bullying. Thank you for publishing the study. It's all hands on deck here.

1.a. Thank You

Sedro Woolley, WA 98284

Here's another comment for you. Don't you just love my commentary? I as the biggest fan of OLF Coupeville intend to be in this post-racial society Stephen A. Smith mouthing off about Kolin Krapernick's refusal to vote. Now here's my commentary sent into the Whidbey Examiner bringing the heat and framing the issue appropriately so we're putting Central Whidbey in a situation where they realize REALITY and stop the shitstorm. Oh and when the shitstorm cometh; I will stand with a Navy that protects MY FREEDOM to vote, to protest, to peacefully assemble, to pray or not to, to speak, and the freedom of the press... NOT agitating ingrates. The sortie: ----- Dear Editor; I'll be acute with you and your Central Whidbey readers: I'm not just a fan of OLF Coupeville or OLFer for short, but a fan of Ebey's National Historic Reserve (hereafter Ebey's NHR for brevity). How could that be? Isn't there a group called "Citizens of the Ebey's Reserve" that wants to shut down OLF Coupeville and burn ██████████ in effigy? Yeah, but I don't see how Ebey's NHR which has taken possession of some of OLF Coupeville and accepted responsibility for preserving the military history of Central Whidbey could be opposed to incorporating OLF Coupeville into the Ebey's NHR story? I sure see how Ebey's NHR has helped provide land use patterns conducive to Field Carrier Landing Practice at OLF Coupeville which I appreciate. I also don't see how the Town of Coupeville with its name gracing America's OLF has a Town Government writing letters that seemingly indicate a desire to dissassociate the Town from the Navy, OLFers and even OLF Coupeville. If this is a misperception, please advise. On that note, I would highly counsel Central Whidbey and Ebey's NHR leadership to embrace OLF Coupeville. Remember that your missives to the EA-18G Growler EIS staff speak not just for you, but your neighbors and your business community please. Oh and to a lesser extent, your friends in the region. Yours; ██████████, Proud OLFer Skagit County

-----

Response to Draft EIS for

EA-18G "Growler" Airfield Operations at NAS Whidbey Island



- 1.a. Thank You
- 14.c. Pedestrians, Bicycles, and Bus Stops
- 2.c. Compliance with the National Environmental Policy Act
- 2.m. Record of Decision/Preferred Alternative
- 3.a. Aircraft Operations
- 3.j. Flight Simulators
- 3.k. Flight and Maintenance Noise Reduction
- 4.t. Noise Mitigation
- 5.c. Condition of Outlying Landing Field Coupeville
- 8.b. Section 106 Process

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## DEDICATION

This sortie is for Lt. Cmdr. Nate Barton, USN and his family. Everything to get NAS Whidbey Island's first Blue Angel jet pilot home to his bride and kids. It's why I'm calling this OPERATION NATE STORM. The "Nate" is for him, who also was a Landing Signal Officer at OLF. The "Storm" is well, it's been confrontational with these COERs and it will be so again.

I want my fellow OLFers and I who got hooked on naval aviation watching the Blue Angels to *give back* to Naval Aviation. American citizens like I get to have freedom and awesome parents because the Armed Forces got our backs – and I can't think of a higher honor as an American than to get the backs of our Navy.

I add the penultimate honor I have as an American is being a "Fat Albert" passenger. 31 July 2015. This mission is also for getting to pull at least 2 if not 3 positive G and at least a bit of terrifying negative G over Seattle & Lake Washington with my pilot Major Dusty Cook, my copilot Major Mark Hamilton and observer Captain Katie Ann Higgins Cook. I carry my Bert Coin in my wallet at all times, ready to yank out as appropriate and necessary – like, I don't know, when I'm downrange in The Belly of The Beast called the Island County Commissioners' Chamber and the COER are all around. Never lost a community confrontation and kept my honor clean with that coin in my hand – especially when I had to "fly" four sorties downrange to the Island County Board of Health to hold the line against COER. Long deployments of at least three hours ingress and three-four hours out on public transportation; but at least the COER got no traction. I just hope my Bert Crew is proud of their Bert Passenger – those sorties *and especially this one* is for them and what the Fat Albert program stands for: Spread the troops word and support our frontline troops.



Figure 1: [REDACTED] Fat Albert Coin



Figure 2: My photo from my [Whidbey Daily](#) assignment aboard "Fat Albert"

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## INTRODUCTORY THOUGHTS

I want to begin by stating I believe this Draft EIS comment period may just be the last realistic public comment on OLF for the next 20-30 years. Or possibly more, until the EA-18G Growler replacement matures. As such, writing this response is a serious and through undertaking on my part to conclude several years of defending OLF Coupeville, up to and requesting an EIS in a petition I initiated whose cover sheet is Appendix A. Please understand that I understand you, the United States Navy, are required by law to respond to each and every comment to this Draft EIS. I know my friends in America's VAQ Wing are counting on ME to clear the road to keep OLF open and expand its use to an appropriate level. To that end, regardless of how many Growlers you get in the end from Congress, I endorse Scenario A – maximize OLF use.



Figure 3 [REDACTED] Photo of OLF Flight Ops

You may have noticed I use the term OLF—as OLF is short for Outlying Field. A section of my comments will address why I believe OLF needs a name change. I have arrived at the view that the Town of Coupeville may just welcome a name change request and obviously I'm of the view OLF needs to be vigorously defended—up to and including some new branding.

If this EIS process is going to be the last word and there is no successful appeal, then you have a moral obligation to err on the side of "ideal training" over "noise impacts" to a smaller community that *consciously* choose to encroach on OLF in the name of using OLF as OLF, "more closely replicates the pattern and conditions at sea and therefore provides superior training" (Page ES-3). I'm not denying noise impacts at OLF, and clearly the National Park Service is to be commended for doing an actual noise study in Ebey's NHR—doing the work the Navy was requested to do and—albeit very politely—refused the community request.

## WHY OLF?

### Thank You for Responding to Petition to Explain Why OLF

I am very happy with pages 2-18 & 2-19 under "Regional civilian airfields" and "Construct a new OLF" that you resolved why replacing OLF... won't fly and before that pages 2-15 to 2-17 why the Growlers get to stay at NAS Whidbey Island. I want to mention again Appendix A which is the cover sheet to a petition with 1,626 signatures that required an Environmental Impact Statement (EIS) that requested, "Why America's OLF is so vital to the national defense" and, "What exactly an alternative OLF would cost at say preferably Skagit Regional Airport (KBVS), or possibly Quillayute Airport (KUILL), the Yakima Firing Range, or Hanford Nuclear Reservation versus eminent domain around OLF Coupeville (KNRA)."

Considering the 2013 COER petition never mentioned an Environmental Impact Statement at <http://petitions.moveon.org/sign/citizens-group-to-take> filled with spam signatures and considering the COER 2013 litigation complaint only requested, "the required environmental review of its flight operations at OLF," without any parameters I think it's safe to say you are responding to the petition I quarterbacked and exposing some ground truths. You see, the folks that support our troops also wanted resolved for the public record these

issues of community concern. You resolved those issues, especially very clearly in Appendix H. We asked, you listened, you pithily responded in depth, I thank you.

#### As Captain Moore, USN Explains...

In a recent public records request of Island County Health Department, this 14 July 2016 e-mail from NAS Whidbey Island CO Captain Geoffrey Moore, USN to Island County Commissioner Helen Price-Johnson I think said the best why OLF Coupeville as per Appendix B:

The crews cover altitude adherence in every brief before every OLF Coupeville flight--not only because of the requirement to adhere to our air operations manual, but because it is important to be on altitude and airspeed when a pilot commences their 180 degree descending profile to landing. Any failure to be on altitude--high or low--will most often result in a poor landing pass. I liken it to a boat's approach to a pier--if you start your transition with too much speed, the work load is significantly higher as you have to decelerate more than normal, therefore increasing the odds of overrunning the pier or hitting it with higher than desirable speed.

It's the same thing in the aircraft, only with speed, altitude, and maintaining an optimal abeam distance from the runway. As we develop muscle memory for the approach, it is a disadvantage to be high or low, fast or slow from the ideal starting point when one commences their landing approach; in this situation the pilot will have to work harder to get the aircraft back on parameters as they make the approach which will more likely than not result in a less than optimal landing or waveoff. Another way to look at it--not being on altitude or airspeed or at proper distance from the runway is like a professional batter not being ready to swing when the pitcher commences their windup--they will most likely never catch up.



Figure 4: 6 January 2014 FCLP at OLF

Failure to hit their parameters when flying our Field Carrier Landing Practice approaches at Ault Field or OLF Coupeville will only be more pronounced when a pilot makes their approach to the moving flight deck on the carrier--this is why our Landing Signal Officers constantly emphasize this as they review each pass

I republish this e-mail as a) I think it should be damn clear the *raison d'être* of OLF and b) To make damn sure this e-mail is in the official record just-in-case COER appeals.

#### Quoting Declarations Received to Stop Injunction Attempt

Considering that Captain Moore's naval aviation experience has been with helicopter squadrons, I wanted to slide in Captain Benjamin Hewlett, USN's declaration into this testimony (See Appendix C) to rebut a 2015 attempt to close OLF Coupeville via an injunction:

I was designated a Naval Aviator following completion of advanced aviator training in January 1995. Over the past 20 years, I have served as an operational aviator and a flight instructor, including duty as a Carrier Air Wing Landing Signals Officer, where I was responsible for the safe and expeditious recovery of all aircraft aboard the aircraft carrier. ... I have personally flown the EA-18G "Growler" on numerous occasions, and I have flown out of NAS Whidbey Island and practiced FCLPs at Outlying Landing Field ("OLF") 10 Coupeville. I have 760 carrier-arrested landings. ... The dynamic and high risk nature of night carrier operations requires very strict night Field Carrier Landing Practice (FCLP) periodicities for aircrew proficiency prior to embarking the ship for any at sea period in order to ensure the an acceptable level of risk is maintained. Carrier landings are a perishable skill, and Navy policy mandates that FCLP training should be conducted within five days of landing on the aircraft carrier and must in no case be conducted more than 10 days prior to landing on the carrier. Having conducted FCLPs at OLF Coupeville, I believe OLF Coupeville provides a realistic environment in which to practice FCLPs. Any degradation of the ability for VAQ-137 to conduct FCLPs in an environment as ideal as OLF Coupeville prior to embarking aboard ship will degrade U.S. and coalition combat effectiveness while creating unacceptable risks for the aviators and crewmembers aboard TR [TR = USS *Theodore Roosevelt*].



Figure 5: VAQ-137 Rooks Using OLF in 9/2014

Let me also quote the immediate former CO of NAS Whidbey Island Captain Mike Nortier, USN as well who wrote the judiciary and whose declaration is Appendix D:

I was in command of NAS Whidbey Island on June 28, 2013 when U.S. Fleet Forces halted flight operations at OLF Coupeville, and when FCLPs at OLF Coupeville resumed in January 2014. Ault Field was utilized to meet most of the remaining FCLP training requirements for that year. The suspension of flight operations at OLF Coupeville created operational impacts that were not sustainable, either as a permanent solution or as a temporary solution extending much longer than what was experienced in 2013.

...

During November of 2013, as several squadrons conducted FCLPs in preparation for deploying on aircraft carriers, other aircraft awaiting departures and arrivals encountered extensive delays, in some cases greater than 45 minutes. The back-up of aircraft waiting to take off or land accumulates when closed-pattern FCLPs are conducted at Ault Field. Because FCLPs are so closely sequenced, non-FCLP aircraft must hold on the taxiway to await a gap in flying to safely depart. Backups on the airport taxiways due to FCLPs lead to missed training windows in military operations areas (MOAs) and military training routes (MTRs), which are tightly scheduled to meet the requirements of 20 squadrons assigned to NAS Whidbey Island. In order to relieve the congestion on the ground in 2013, the air traffic controllers had to create space between airborne FCLP aircraft-to create an opening in what is normally a closed pattern-so that other aircraft could take off or land. This lengthened the FCLP pattern so that aircraft flew outside the standard FCLP patterns. This has a detrimental impact on FCLP training, because the pattern being flown no longer closely resembles the pattern flown at sea. It also means that FCLP aircraft fly over different locations in the community than under a standard pattern, which tends to give rise to additional noise complaints.

I know Captain Nortier personally and I know Captain Nortier is a man of professional honor. If Captain Nortier claimed, "operational impacts that were not sustainable" then much *deference* should be given to the warfighters defending these United States of America.

## OLF IS NOT NEW, NOR ARE NOISE COMPLAINTS

In the past year, as able, yours truly has been browsing the Whidbey News-Times on the Oak Harbor Library microfiche archives. I register disappointment at the lack of historical documentation and discussion about OLF in your report. Being you will receive quite a few pro-OLF comments and this response is heavily biased as being from a self-identified afterburner extremist, I'm going to select a small handful of newspaper articles.

### 1967 Reactivation of OLF

For instance, in 1967 alone, the 26 January 1967 Whidbey News-Times reported OLF on 5 January 1967 had three Grumman A-6A Intruders show up and bounce, initiating jet usage of the OLF (See Appendix E-1). The 3 August 1967 Whidbey News-Times (See Appendix) went on to report full training ops would begin in September and then laid out the operations of OLF in 1967 which appear to mirror the case today (See Appendix E-2). However, the 21 September 1967 Whidbey News-Times in an article titled, "Coupeville Flights Curtailed", "Flight operations until early morning hours by Whidbey Island Naval Air Station jets at the Coupeville field produced some unhappy people in the Coupeville area this past week. ... The Coupeville field was recently reactivated to handle increased training requirements for the A6A medium jet attack squadrons and the A3B heavy jet attack-aerial refueler squadrons" (See Appendix E-3).

### 1987 Rise of WISE

In 1987, a group called Whidbey Islanders for a Sound Environment or WISE formed. According to the 4 November 1987 Whidbey News-Times (See Appendix E-4), Ken Pickard (now of COER) was an attorney. The group wanted to enter into a dialogue with the Navy while also considering litigation and pressure upon politicians. In a 9 May 1992 Whidbey News-Times article titled, "County supporting Navy during '87 controversy" and as Appendix E-5 reminiscing about 1987, the article mentions pressure applied upon the Island County Commissioners and, "**WISE attorney Ken Pickard** later said his group was contemplating a conflict-of-interest lawsuit against Koetje because he owns land in the disputed zones. No action was ever filed."

### 1991 BRAC Attempt

In the heady days of the spring of 1991, Whidbey Islanders for a Sound Environment or WISE even went so far as to testify to the Base Closure and Realignment Commission (BRAC) that according to the 8 May 1991 Whidbey News-Times, about the "WISE membership vote in favor of the Navy's decision to close NAS Whidbey." Like a certain COER now, WISE claimed, "We are not against the Navy. We are for solving some problems." (See Appendix E-6). Now you know why local supporters of NAS Whidbey Island get real cynical when we hear from noise complainers like COER, "We are not against the Navy".

## DAYS OF OLF USE?

*Moving along*, I noticed that your displays at the Draft EIS Public Meetings make a reference to # of days OLF is being used currently, but you do not have in the Draft EIS how many days each scenario will be using OLF. Below is a crop on the display "Airfield Operations":

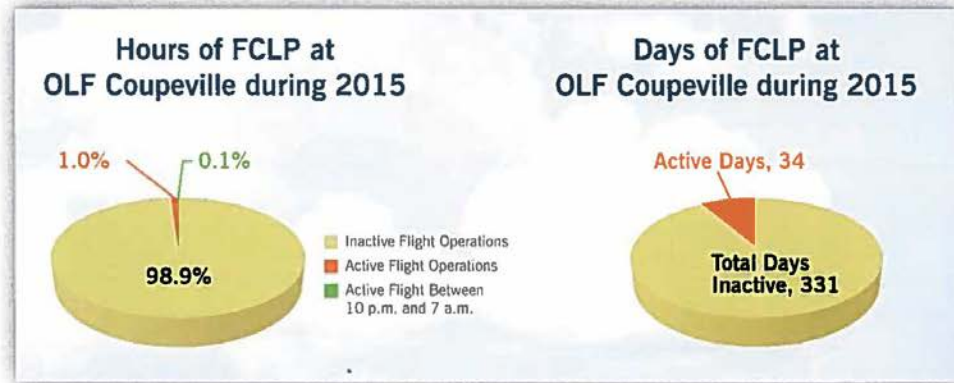


Figure 6: Airfield Operations Graphic at EA-18G Draft EIS Open Houses

It would be interesting what the pie charts would be under Scenarios A, B & C. Also helpful to show, "OK Scenario A entails this many OLF days versus 'no action' just so you know".

## THANKS FOR NOT SPLITTING THE VAQ WING UP

I agree with your comments from pages 2-13 to 2-19. I think the costs of doing what COER and other such noise agitation groups want (e.g. build OLF replacement, split up the VAQ Wing) far outweigh the costs of any successful future inverse condemnation or eminent domain suit noise agitation groups may bring against the US Government.

As to your specific comments on page 2-18 regarding "Detachment training out of the region", I got to cover for AIR International the homecoming of the VAQ-139 Cougars in the spring of 2015. One of the aircrew, who shall remain anonymous as he wasn't being interviewed to respond to your Draft EIS, told me straight up having to go to NAF El Centro would mean 2-3 weeks away from family before a historic 10 month deployment.

I'm happy the US Navy Department is seeking to prioritize military families over jerks who consciously choose to live next to a Naval Outlying Field and then complain about the noise. Oh and then claim health hazard but never request eminent domain or inverse condemnation.

## A Note From the Scoping Period

I noted back on 10 October 2014 when you issued in the National Register a, "Revised Notice of Intent To Prepare an Environmental Impact Statement for EA-18G Growler Airfield Operations at Naval Air Station Whidbey Island, WA and Notice of Request for Public Scoping Comments" at <https://goo.gl/oC1Aqi>, you said very publicly in part, "The DoN is not considering alternative locations for FCLP training, or squadron relocation." If Citizens of the Ebey's Reserve (COER) had a problem with this, well then you have to ask yourself why did COER not appeal demanding a course correction?

It's blatantly obvious to me COER has questionable standing at best to impugn this EIS as a result. Especially as the group that initiated this EIS process in its litigatory complaint requested only, "The required environmental review of its flight operations at OLF" with no specific legal request to seek alternatives to OLF. I am

mentioning this so that if there is judicial review of this EIS, then the documentation is presented into the record for a rapid rebuttal.

### PLEASE USE THE AFTERBURNERS AT OLF EVERY BOUNCE!

It smacks of coddling COER or of children with training wheels flying the EA-18G Growler when the Growlers do not use the afterburners at OLF Coupeville. Using afterburners at OLF gets the OLFers doing dances. *You mind* using the afterburners more often like below please:



*Figure 7: Vapes and Burner at OLF... Priceless*

I mean I'm an afterburner extremist, as I will travel into Abbotsford, Canada and Joint Base Lewis-McChord in the name of getting afterburner in my life from the US Navy Tac Demo. I would appreciate very much the use of afterburner at OLF Coupeville on a regular basis *please*, it's time noise complainers were told to be elsewhere.

Once those afterburners of freedom go off, it's the brightest lights in the sky. Your patriotic pride soars. You know the people whining and requesting "noise abatement" will never, ever support the Navy. Instead you get a full airshow in *your* community.

Speaking of airshows and the community, you mind please having the US Navy Tac Demo come up to NAS Whidbey Island and perform every single year please? I mean I *am* an afterburner extremist but quite frankly who does not want the thrills of a Super Hornet pulling the vapes out of the sky and lighting the skies with afterburner? Oh people who will never love you, people who hate the military, people who want to sink the Navy. Please *stop* accommodating folks who move next to a Naval Air Station and complain about the noise. Instead you should openly encourage, welcome and reward afterburner extremists!

After all, I really appreciate the 142<sup>nd</sup> Fighter Wing out of Oregon for protecting our local air sovereignty. I also had the honour of touring the Wing last August, but the best part, bar none was the afterburner take-off that put an *afterburner grin* on my face. Especially as I can choose to wear hearing protection so when I get home or back to my hotel, I can hear me type and my favourite podcasts.

My point being: Afterburner take-offs make me smile. Please use afterburners. Thanks!



Figure 8: USN Tac Demo Afterburner... at Abbotsford Airshow, BC, Canada



Figure 9: Oregon ANG F-15C Afterburner Take-Off

## PUBLIC NOTIFICATION

### Field Carrier Landing Practice (FCLP) Schedules

Let me begin by stating as per page I-20 of your Draft EIS with my emphasis, "The installation [NAS Whidbey Island] frequently corresponds with numerous media outlets and utilizes its webpage and social media, such as the station's Facebook page, to share flight schedules and other information and to solicit public feedback. Where possible and if weather conditions allow, station officials modify flight operations to minimize noise impacts, such as during weekends and during school exams. ... The installation will continue to publish FCLP schedules and issue notifications for additional activities, such as weekend festivals." I ask you continue to publish the NAS Whidbey Island FCLP schedules please so folks who support OLF can attend and those claiming adverse impacts from OLF can make alternative plans. These FCLP schedules are vey much appreciated.

Response to Draft EIS for EA-18G "Growler" Airfield Operations at NAS Whidbey Island

Let me add as well that as early as 1968 you were having the Whidbey News-Times publish schedules with the times – not just some “mid afternoon” or “late evening” statement. Here’s from the October 30, 1969 Whidbey News-Times as per Appendix E-7:



Figure 10: FCLP Schedule at OLF in October 30, 1969 Whidbey News-Times

Also, here’s from the 16 December 1987 Whidbey News-Times:

**Navy Field Landing Practice**  
For week of Dec. 16-22

	Wed.	Thurs.	Fri.	Sat.	Sun.	Mon.	Tues.
<b>Ault Field</b>	5-9 p.m.	10 a.m. - 1 p.m.	clear	clear	clear	11 a.m. - 3 p.m.	11 a.m. - 3 p.m.
<b>OLF Coupeville</b>	clear	clear	clear	clear	clear	3:45 p.m. - 4:45 p.m.	4:45 p.m. - 5 p.m.

All times listed in this schedule are subject to change due to weather, operational commitments and/or training requirements. This information is also broadcast daily on radio station KJTT, 1110 AM. For current FCLP schedules, call the NAS Whidbey Weather/FCLP hotline at 287-2671.

Figure 11: December 16-22, 1987 FCLP Schedule

I also think it would build trust if the Navy would also please make public each week how close the Navy is to its annual allowance of using OLF. Somehow on 25 June 2016, USN Captain Geoffrey Moore can e-mail Island County Commissioner Price-Johnson as per Appendix F,

I discussed the downwind altitude with my operations officer after our discussion on Tuesday, and confirmed that the daytime altitude of 800 feet and the nighttime altitude of 1,200 feet has not changed in as far back as they have been stationed at NAS Whidbey Island. These altitudes are the same ones that we fly at the carrier, and with the precision requirements of that difficult task, the best training is achieved when we can duplicate the sight picture of the same altitude as the carrier pattern.



Response to Draft EIS for EA-18G "Growler" Airfield Operations at NAS Whidbey Island

As of this morning, we have flown 3,906 operations of our NEPA allowance of 6,120 operations. That translates into 56 hours and 7 minutes total flight time at OLF Coupeville since January 1st; 5 hours and 14 minutes of that total has been flown between 10 p.m. and midnight.

I wish this above information was please attached to the weekly FCLP schedules. Thanks.

### Flyovers & Guest Stars

Since this is about EA-18G Airfield Ops, I really think it is germane to bring up VAQ Wing flyovers and "guest stars" that train with the VAQ Wing. I submit it would be in the US Navy's interests to let folks know if/when NAS Whidbey Island is going to do flyovers and other public participation. I, for one, would travel to see a flyover. Also I'd like to request a flyover in afterburner of local airshows and also, obviously the Santa Clara Forty Whiners fan club in Central Whidbey calling themselves COER.

Furthermore, for some folks having a website like the Royal Australian Air Force (RAAF) or Facebook postings by the 142<sup>nd</sup> Fighter Wing out of Oregon notifying folks of increased flight ops helps folks plan their lives. I think NAS Whidbey Island should continue to advise folks of Field Carrier Landing Practice flight ops but also let people know ASAP when there are training exercises the base participates in and also for instance a B-1B Bomber is coming or a F-22 Raptor or the VFC-12 "Fighting Omars" come to town so folks can enjoy a little airshow in their community!

Obviously if um, two certain US Marine Corps Majors and a Captain in their C-130J could please come to Whidbey and reenact being "Fat Albert" pilots, that would be much appreciated. The more guest stars, the merrier. Beat COER! Thanks.



Figure 12: VFC-12 "Fighting Omars" Spotted on 2013 Public Tour of NAS Whidbey

### POTENTIAL OTHER SERVICES' USE OF OLF

I have to inquire that when OLF sits unused by NAS Whidbey Island, why not use the OLF for C-17s out of McChord AFB to practice short-field landings and take-offs? Or Marines come up to practice with C-130Js and V-22s? Or Fort Lewis helicopters to come up to OLF and scrimmage? Or bring some Hornets up from NAS Lemoore for extra Field Carrier Landing Practice? I mean, on the days NAS Whidbey Island isn't using OLF, why let OLF sit idle if the environmental impacts will be less than the EA-18G Growler? Why should the Navy Department let the Marine Corps and the Air Force and yes, the Army not join in the fun in honoring noise requests? I mean there are some who'd pay a PREMIUM to live next to an airport and who would love OLF to never sit fallow!



Figure 13: Yes, C-17s Need Short Fields Too

### SECTION 106 COMMENTS

#### A Few Words About the Section 106 Process

I am publicly registering my fundamentally displeasure where most of the details about process has been found via public disclosure requests and well-timed leaks by government relations special operatives such as I. I

Response to Draft EIS for EA-18G "Growler" Airfield Operations at NAS Whidbey Island

am fundamentally disturbed at the thought the Section 106 process Barriergate (informal name for the political fallout from placing eco-blocks around OLF) group tilts so far anti-OLF and pro-OLF voices are excluded.

~~Perhaps the consulting party has could be repeated~~

Let's not forget: COER has said many times in many online and physical public forums at a minimum fundamental opposition to the EA-18G Growler at NAS Whidbey Island as per Appendix G – but I am responding to the US Navy Department and a US Navy Draft EIS before me so I will ask instead: Where is the consultation with *proponents* for the NAS Whidbey Island?

### Area of Potential Effect (APE)

I ask the US Navy please take this position: The only APE that matters is OLF Coupeville and maybe Ebey's NHR if Ebey's NHR Board makes this a condition of *embracing* OLF. Period.

### Mow the Damn Grass

Sometimes when I show up for a Field Carrier Landing Practice (FCLP), I find the grass has not been mowed. Considering I have pictures of tires smoking and you have jets bouncing around, there is a potential fire hazard. I have no desire to ignore something that could interfere with farming operations at Ebey's NHR. Also as a former farmer until my misaligned spine got worse; I know that weeds allowed to grow on a neighbor's yard can easily spread for square miles. Finally, as somebody who likes to photograph the flight ops the natural vegetation can interfere with photo ops. For all of those reasons, *please* mow the grass at least every two weeks as you would your home lawn.



Figure 14: Please Mow the Grass Before FCLP

So what if somebody has to see some concrete blocks entering Ebey's NHR? Big whoop-dee-do. COER and their pals whining about noise disclosure say folks were not aware driving past OLF – so why not make OLF more visible to folks driving by? Why does Navy Region Northwest seem so eager to accommodate the folks who have litigated against NAS Whidbey Island but *not* the supporters of OLF?

### What About Rewarding the OLFers Instead?

I'm going to make the suggestion at the end of the day, instead of trying to appease the unappeasable and angering your friends... I mean... just do anything to change slightlines a little at OLF and COER and their pets in DAHP scream, "ADVERSE IMPACT" and now we get years of process inside a leaky box to appease the unappeasable.

So if we're going to have this nice, tidy arrangement let's just swing the pendulum so far where COER gets the message, "COER, EVEN WHEN YOU'RE SCRIPTED, YOU'RE USELESS!" I would really like to see a conversation about making OLF more aviation photographer friendly. I mean maybe a circumference trail? Maybe push in the lines so folks can get closer as long as we do not interfere with Field Carrier Landing Practice? Maybe an annual photocall at the OLF? Make OLF more publicly visible and there you go. This fan of OLF wants to have a passionate fan base that Navy servicemembers can be proud of OLFers support.

## Honor the Heroes Who Saved OLF

Let me quote former General Stanley McChrystal who said on National Geographic's American War General when he was touring Gettysburg monuments, "They put volunteer because they were proud to have been volunteers. They were communicating they weren't drafted. That they were here by choice. The monuments were put after the fight. And for many years I had a tough time understanding what the monuments were about because I thought they were about guys wanting credit for what they done, put a monument here, beat their chest and say I'm a hero. That's not what they are. They were trying to simply mark a place where they had served and where they'd made a sacrifice. They wanted some validation that what they had done mattered. Because it doesn't feel good at the time. It's difficult and it's dirty and it's frightening and sometimes you're not quite the soldier you want to be and you're part of things that you'll never think you'll have to be part of. You need some affirmation. It's important 150 years ago and it's important today."

To that end, you folks on the Navy EIS Staff please honor yourselves on the Navy EIS Staff with a plaque or something with your names. You better honor one U.S. Attorney Rachel K. Roberts who stopped the 2015 COER Injunction Attempt – maybe a bench at a OLF viewing site? Please consider honoring the US Navy sailors who have served at OLF as well. As far as me goes, just name a bus stop at OLF That complies with AICUZ the "██████████ Bus Stop" with a plaque that says, "Yeah you can have autism, you can have a bad back, you can have bad left eye and you can have PTSD... but you can *still* serve and give back to the greatest nation on the planet. America is GREAT because Americans give back and make America GREATER." *Thanks.*

## RENAMING OLF COUPEVILLE (KNRA)

This request may or may not be within scope of the Navy's Environmental Impact Study, but considering the Town Government of Coupeville's *seeming* opposition to this study, considering most of the opposition to Field Carrier Landing Practice at OLF and considering how the call letters of NRA are absolutely political and offensive – I think it's time for a name change.



Figure 15: Coupeville 6/2013 "Zip Code Forum"

- OLF (Michael J.) Smith would be to honor the late A-6 pilot and NASA Shuttle Pilot who perished in the Challenger explosion. Some of Smith's service was at NAS Whidbey Island.
- OLF (William C.) McCool would be to honor a former VAQ-133 Wizards EA-6B Landing Signal Officer who worked at OLF and then served as a test pilot, a department head in VAQ-132 Scorpions, as a test pilot and then in NASA. Sadly perished in the Columbia tragedy.
- OLF (Nate) Barton may be a long shot, but if the first two don't work then I like the idea of naming OLF after the first NAS Whidbey Island Blue Angels pilot. I have to say the 2014 & 2015 Blue Angels seasons were spectacular looking for Blue Angel #3 and Blue Angel #4 respectively.

Also um, considering my mother Linda was attacked in front of her Autistic Spectrum (Asperger's) son with a gun obtained through a loophole the National Rifle Association or NRA fought to defend for felons... I would really appreciate the call letters be replaced on OLF Coupeville please to KNZR or KNLR. When you do change the call letters, I want my two parents to cut the orange ribbon and when they do, I want it real clear that was for my folks. Not me. Thanks, as I credit my parents with a lot of who and what I am.

## CONCLUDING THOUGHTS

*This is a moment to seize. The Kaleidoscope has been shaken. The pieces are in flux. Soon they will settle again. Before they do, let us re-order this world around us.*

Right Honorable Tony Blair, Former British Prime Minister

Indeed, this *is* a moment to seize. You are seeking a clear mandate to keep OLF safely free from future threat, and I have sought to help you.

It's blatantly obvious the legally allowed time to appeal the 2005 Environmental Assessment (EA) into EA-18G Growler basing at NAS Whidbey Island has passed. As such, all this EIS can do is build upon the EA and make NAS Whidbey Island a better home for the VAQ Wing. Which is the goal of my comments.

That said, I want to be straight-up with all you US Navy folks and I want to explain in my own words why this fire in my belly. Yes, I love afterburners. Yes, I love vapes. Yes, I love "OLF Fridays". Yes, I love EA-18Gs. But you know what I love a lot more? OUR TROOPS. I am ASHAMED I am not in uniform defending this country and our freedoms. As such, the LEAST I can do, the LEAST I can do as an American is stick up for OUR troops and exercise my rights.

I also appreciate and want to commend the EIS Staff on what has been a stressful time. Some of you have given birth to children during this process. Some of you have been treated with absolute disrespect during this process. I appreciate your sacrifices and efforts to make sure America's Navy answered to We The People. So much so as of 3 December as per Appendix H, 500 "Post Clicks" on an ad that simply said, "Support [Naval Outlying Field Coupeville](#)? Then get in a pro-OLF comment to <http://whidbeyeis.com/Comment.aspx> please."

If there was any realistic alternative to using OLF, I would lend support but *your* Appendix H: Civilian Airfield Analysis makes pretty doggone clear there is no alternative to NAS Whidbey's OLF. I also agree wholeheartedly with what is written in pages 1-7 & 1-8. But what is said on page 2-2 is acute and perfect for quoting in a conclusion:

The Navy established requirements for FCLP airfields in order to ensure that FCLP realistically trains Naval aviators to land on an aircraft carrier and used these requirements to inform the development of alternatives. These requirements are crucial because landing on an aircraft carrier is perhaps the most difficult operation in military aviation.

Now let's see this through to a logical conclusion. Scenario A for OLF provides the flexibility the troops I talk to want and when you are falling 700 feet per minute at 159 miles an hour to catch one of four wires in a very tight spot – sometimes at night, safety and ample training should take priority. Lots of afterburner. Remember the men and women who fought hard to stop COER *for America*. Rename OLF. Let's bring back to OLF the days when Growlers from all VAQ carrier-borne squadrons – not just the vital Fleet Replacement Squadron – could come and bounce in afterburner please as you, US Navy, are *not* the problem:



Figure 16: VAQ-139 Cougars Kindly Using Afterburner at OLF

## LIST OF APPENDICES

- **Appendix A: 2013 Petition Cover Sheet: SAVE OLF COUPEVILLE,**  
<http://www.ipetitions.com/petition/save-olf>
- **Appendix B: 2016-07-14 E-mail From Captain Geoffrey Moore, USN**
- **Appendix C: 2015-05-29 Declaration of Captain Benjamin Hewlett**
- **Appendix D: 2015-05-29 Declaration of Captain Mike Nortier**
- **Appendix E: Selected Newspaper Articles**
  1. 1967-01-26 Whidbey News-Times (WNT): Navy Works on Coupeville Strip
  2. 1967-08-03 WNT: Coupeville Airstrip Readied For Operations
  3. 1967-09-21 WNT: Coupeville Flights Curtailed
  4. 1987-11-04 WNT: Anti-Noise Group Launches Three-Prong Attack
  5. 1992-05-09 WNT: County supporting Navy during '87 controversy
  6. 1991-05-08 WNT: WISE membership vote in favor of the Navy's decision to close NAS Whidbey
  7. 1969-10-30 WNT: Coupeville Field
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- **Appendix G: COER Wants To Get Rid of NASWI**
- **Appendix H: Stats of AvgeekJoe Productions' Facebook Ad**

**NOTE:** Please do not attempt/bother to respond to each paragraph in these appendices, they are simply source material for your reference to fine-tune the EIS and solidify my remarks.

Respectfully;



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4. 1987-11-04 WNT: Anti-Noise Group Launches Three-Prong Attack
5. 1992-05-09 WNT: County supporting Navy during '87 controversy
6. 1991-05-08 WNT: WISE membership vote in favor of the Navy's decision to close NAS Whidbey
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Respectfully;



## APPENDIX A: 2013 SAVE OLF COUPEVILLE PETITION COVER SHEET

# SAVE OLF COUPEVILLE

[The Petition](#) | [Highlight](#) | [Comments](#) 1626 | [Signatures](#)

**TO THE UNITED STATES NAVY; REAR ADMIRAL BOLIVAR, NAVY REGION NORTHWEST; NAS WHIDBEY ISLAND CAPTAIN NORTIER, BUT MOST OF ALL TO THE ELECTRONIC ATTACK WING, US PACIFIC FLEET THROUGH CO CAPTAIN SPRINGETT II AND XO CAPTAIN WALKER...**

Where Citizen's of Ebey's Reserve have sued the US Navy over OLF Coupeville (KNRA, America's OLF) **AFTER** being required since 1992 in Island County Code to sign at the point of sale noise disclosure forms noting the presence of a military jet soundtrack... we have a message for you:

**a) We appreciate the superheroic service of all in the Electronic Attack Wing U.S. Pacific Fleet keeping America safe. You inspire and motivate almost all of your fellow Americans to be better Americans!** So we're going to get your backs... for once.

**b) We oppose the threat to sailors' safety, our nation's defense and the regional economy the closure of OLF Coupeville would represent.**

**c) We call upon the United States Navy to agree to an EIS with Citizen's of Ebey's Reserve in return for tolerance of OLF operations so that US Navy representatives can finally discuss with the general public and not just select audiences:**

>Why America's OLF is so vital to the national defense.

>What exactly an alternative OLF would cost at say preferably Skagit Regional Airport (KBVS), or possibly Quillayute Airport (KUIL), the Yakima

Firing Range, or Hanford Nuclear Reservation *versus* eminent domain around OLF Coupeville (KNRA).

>How we can mitigate the impacts from OLF Coupeville, whether that be a tourism campaign to recruit international aviation fans to see OLF Coupeville now that America's OLF on a schedule, text messages 15 minutes before OLF Coupeville use, better Island County Planning policies, and/or eminent domain.

**d)** We have news for [REDACTED], President of the Citizens of the Ebey's Reserve: You have said "close the base" and "the NAS base keeps the Island dysfunctional". We say instead: **"Keep NAS Whidbey Island and OLF Coupeville open until world peace, which we all hope is soon."**

**e)** This better be **EA-18G Growling loud to Electronic Attack Wing, US Pacific Fleet: Any** remaining silence from your real friends ends. A reach for a temporary restraining order against training at OLF Coupeville for the freedom of all 3,143 counties is beyond the pale and deserves a most blunt response in gratitude for your superheroic service.

**KEEP 'EM GROWLING AND PROWLING... BUT YOU COME HOME TO US!**  
THANK YOU SO MUCH!!

SPONSOR

[REDACTED]



**APPENDIX B: 2016-07-14 E-MAIL FROM CAPTAIN GEOFFREY MOORE, USN**

**From:** Moore, Geoffrey C CAPT CO NAS Whidbey Is, N00  
**To:** Helen Price Johnson  
**Cc:** Pam Dill  
**Subject:** RE: OLF flights too low  
**Date:** Thursday, July 14, 2016 8:15:46 AM  
**Attachments:** smime.p7s

Thanks Helen for forwarding your concern and I'll relay to the Growler wing.

Note, the crews cover altitude adherence in every brief before every OLF Coupeville flight--not only because of the requirement to adhere to our air operations manual, but because it is important to be on altitude and airspeed when a pilot commences their 180 degree descending profile to landing. Any failure to be on altitude--high or low--will most often result in a poor landing pass. I liken it to a boat's approach to a pier--if you start your transition with too much speed, the work load is significantly higher as you have to decelerate more than normal, therefore increasing the odds of overrunning the pier or hitting it with higher than desirable speed.

It's the same thing in the aircraft, only with speed, altitude, and maintaining an optimal abeam distance from the runway. As we develop muscle memory for the approach, it is a disadvantage to be high or low, fast or slow from the ideal starting point when one commences their landing approach; in this situation the pilot will have to work harder to get the aircraft back on parameters as they make the approach which will more likely than not result in a less than optimal landing or waveoff. Another way to look at it--not being on altitude or airspeed or at proper distance from the runway is like a professional batter not being ready to swing when the pitcher commences their windup--they will most likely never catch up.

Failure to hit their parameters when flying our Field Carrier Landing Practice approaches at Ault Field or OLF Coupeville will only be more pronounced when a pilot makes their approach to the moving flight deck on the carrier--this is why our Landing Signal Officers constantly emphasize this as they review each pass. I didn't get to monitor much of the FCLP's at the OLF on Monday on my way to Greenbank Farms for our Lake Hancock open house, but what I did see seemed to be a normal pattern. (The Open House went well, a lot of participation and good feedback from the public. The majority were in favor of our preferred alternative.)

Sincerely,

CAPT Geoff 'Jefe' Moore

Commanding Officer, NAS Whidbey Island

Geoffrey.Moore@navy.mil

Office Phone: 360.257.2037

"For OFFICIAL USE ONLY (FOUO) - This email and attached files may contain Privacy Sensitive information or Law Enforcement Sensitive Information. Any misuse or unauthorized disclosure may result in both civil and criminal penalties. If you received this document in error, please notify me at the above phone number and destroy the document immediately in accordance with Privacy Act procedures."

-----Original Message-----

**From:** Helen Price Johnson [[mailto:H.Price\\_Johnson@co.island.wa.us](mailto:H.Price_Johnson@co.island.wa.us)]

**Sent:** Tuesday, July 12, 2016 9:33 AM

**To:** Moore, Geoffrey C CAPT CO NAS Whidbey Is, N00

**Cc:** Pam Dill

**Subject:** [Non-DoD Source] OLF flights too low

Capt. Moore,

I am getting reports from residents that some of the pilots were flying especially low yesterday. This greatly intensifies the noise impact and is not necessary. Please help to minimize the impact to the local farming community by encouraging the trainees to stay well above the treetops when passing over these workers today and in the future.

Thank you for your help,

Helen Price Johnson

Island County Commissioner, District 1

Sent from my Verizon Wireless 4G LTE DROID

Appendix C

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District Judge Thomas S. Zilly

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CITIZENS OF THE EBEBY'S RESERVE  
FOR A HEALTHY, SAFE & PEACEFUL  
ENVIRONMENT,

Plaintiff,

v.

U.S. DEPARTMENT OF THE NAVY;  
ADMIRAL PHIL DAVIDSON, in his  
official capacity as the Commander, Fleet  
Forces Command; and CAPTAIN MIKE  
NORTIER, in his official capacity as  
Commander Naval Air Station Whidbey  
Island,

Defendants,

No. 2:13-cv-1232-TSZ

DECLARATION OF CAPTAIN BENJAMIN  
HEWLETT

I, Captain Benjamin Hewlett, U.S. Navy, Commander, Carrier Air Wing ONE, do hereby  
declare as follows:

1. As Commander, Carrier Air Wing ONE ("CAG"), I am responsible for Airborne Electronic  
Attack Squadron 137, an EA-18G squadron home-based at NAS Whidbey Island. The EA-18G  
aircraft is essential to mission success. Field Carrier Landing Practice ("FCLP") training

1 provides EA-18G pilots with the necessary training that they need to safely land on a carrier after  
2 flying demanding missions, sometimes multiple times a day.

3 2. As CAG, I am responsible to the Commander of Carrier Strike Group TWELVE (a one-star  
4 Admiral) for the safe operation and mission accomplishment of all military aircraft launched and  
5 recovered from the Nimitz-class aircraft carrier USS THEODORE ROOSEVELT ("TR") (CVN  
6 71).

7 3. I was designated a Naval Aviator following completion of advanced aviator training in  
8 January 1995. Over the past 20 years, I have served as an operational aviator and a flight  
9 instructor, including duty as a Carrier Air Wing Landing Signals Officer, where I was  
10 responsible for the safe and expeditious recovery of all aircraft aboard the aircraft carrier. I have  
11 held several leadership roles at the squadron level, including a tour as a squadron commanding  
12 officer. I have served six tours on board aircraft carriers, including three deployments in support  
13 of Operation ENDURING FREEDOM ("OEF") flying combat missions into Afghanistan. I  
14 have flown approximately 3,500 mishap free flight hours, primarily in the S-3 Viking and the  
15 F/A-18C Hornet. I have personally flown the EA-18G "Growler" on numerous occasions, and I  
16 have flown out of NAS Whidbey Island and practiced FCLPs at Outlying Landing Field ("OLF")  
17 Coupeville. I have 760 carrier-arrested landings.

18 4. As CAG, my air wing is broken up into seven "squadrons" of aircraft. Each squadron is led  
19 by its own commanding officer and has a slightly different mission and set of capabilities. There  
20 is only one squadron on board that operates the highly advanced EA-18G aircraft—Airborne  
21 Electronic Attack Squadron 137 (VAQ-137), which is home-based in Whidbey Island,  
22 Washington. VAQ-137 has nine pilots and five jets. Due to the highly specialized nature of the  
23 Electronic Attack mission and the relatively small number of aircraft assigned, the EA-18G is a  
24 "high demand, low density" aircraft. VAQ-137 operates less than half the number of jets as my  
25 other squadrons. Even though they are small in number, they are critically important to not only  
26 major combat operations, but to the prevention of conflict. They make an impact across the  
27 spectrum of U.S. military operations that belies their small size.

28 5. EA-18G pilots fly daily in support of Operation INHERENT RESOLVE ("OIR"), the  
29 coalition military operation against the group commonly known as the Islamic State of Iraq and  
30 the Levant ("ISIL"). These flights are many hours in duration, supporting both U.S. and coalition  
31 forces engaged in the fight against ISIL. It is not unusual for a single aircraft to fly multiple  
32 missions in any given day. To support this, aviators operate on an intense and exhausting  
33 schedule. The EA-18G is critical to the success of the entire effort at the tactical, operational  
34 and strategic levels, so much so that if an EA-18G aircraft cannot support operations due to  
35 needed repairs or aviator unavailability, it is frequently the case that the mission is aborted.

36 6. The mission and tactical actions of the EA-18G in support of this operation are classified, but  
37 are crucial to the U.S. and coalition mission both in the air and on the ground. These aircraft and  
38 their highly trained aircrew deny the enemy freedom of action in the electromagnetic spectrum.  
39 They achieve this through the employment of their tactical jamming systems in support of both  
40 ground and air forces engaged against ISIL.

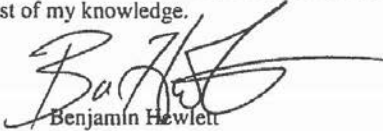
1 7. In order to effectively execute the mission against ISIL, TR and her aviators must operate in  
2 very confined water and air space in the Arabian Gulf. This water and air space includes not  
3 only all of the ships and aircraft from the Strike Group and my Air Wing, but also ships and  
4 aircraft from other Gulf State navies, air forces, and coast guards, as well as oil rigs, commercial  
5 shipping and air traffic. This complex operating environment makes aircraft launch and recovery  
6 exponentially more challenging than open-ocean operations. While the sequencing of aircraft  
7 launches is predictable, occurring approximately every 30 seconds, the sequencing of aircraft  
8 recovery is highly dynamic. The expeditious recovery of aircraft is absolutely critical to the  
9 safety of the ship, her crew and all other vessels and interests in the area. During aircraft  
recovery the aircraft carrier must maintain a constant course and speed, thus restricting the ship's  
maneuverability. If it takes longer to recover aircraft because undertrained aviators are unable to  
land on their first approach it increases already substantial risks and makes it difficult for the ship  
to avoid the unpredictable hazards that can rapidly develop. Aviators returning to the ship are  
especially taxed by the intensity of operations, so their skills absolutely must be second nature  
and perfected before deployment. Any deficiency in an aircrew's training prior to embarking on  
an aircraft carrier increases risk not only the lives of the aviators, but those sailors on the flight  
deck that are mere feet from the aircraft as it takes off or lands.

10 8. In any 24-hour period, over 100 jet and helicopter launches and recoveries are performed by a  
11 team of hundreds of dedicated sailors working together on the flight deck. The rapid launch,  
12 recovery, refueling, and rearming of aircraft from an aircraft carrier is a complex task involving  
13 pilots, maintenance personnel, and support personnel and represents a highly specialized system  
14 of operations unique to naval aviation, which must be choreographed and executed with  
15 precision. Naval personnel must learn how to launch, recover, refuel and rearm aircraft,  
concurrently, at night, often in bad weather, on an aircraft carrier flight deck. In those  
circumstances, safety is paramount: the constant threat posed by jet engine intakes and exhausts,  
turning propellers, and moving aircraft makes the aircraft carrier flight deck an extremely  
dangerous work environment.

16 8. Night carrier operations are the highest risk operations in aviation, but night combat  
17 operations are critical to mission success because of the diminished capability of the enemy to  
18 respond to coalition and U.S. ground and air operations. Every night, EA-18G aviators land  
19 aboard ship, often in a pitch-black environment with rolling seas. Their combat missions are  
20 fatiguing and dangerous. Periodically, storms will move through the area, making seas  
21 unpredictable. Additionally, the environment in the Arabian Gulf is frequently hazy with low  
22 visibility. These poor environmental conditions significantly affect carrier flight operations in  
23 many different ways, and aviators must be well-trained and proficient in order to respond to the  
24 unique requirements of the different circumstances that are encountered. The dynamic and high  
risk nature of night carrier operations requires very strict night Field Carrier Landing Practice  
(FCLP) periodicities for aircrew proficiency prior to embarking the ship for any at sea period in  
order to ensure the an acceptable level of risk is maintained. Carrier landings are a perishable  
skill, and Navy policy mandates that FCLP training should be conducted within five days of  
landing on the aircraft carrier and must in no case be conducted more than 10 days prior to  
landing on the carrier. Having conducted FCLPs at OLF Coupeville, I believe OLF Coupeville  
provides a realistic environment in which to practice FCLPs. Any degradation of the ability for  
VAQ-137 to conduct FCLPs in an environment as ideal as OLF Coupeville prior to embarking

1 aboard ship will degrade U.S. and coalition combat effectiveness while creating unacceptable  
2 risks for the aviators and crewmembers aboard TR.

3 I hereby swear under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing  
4 information is true and correct to the best of my knowledge.

5   
6 Benjamin Hewlett  
7 Captain, U.S. Navy

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Appendix D

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District Judge Thomas S. Zilly

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CITIZENS OF THE EBEBY'S RESERVE  
FOR A HEALTHY, SAFE & PEACEFUL  
ENVIRONMENT,

Plaintiff,

v.

U.S. DEPARTMENT OF THE NAVY;  
ADMIRAL PHIL DAVIDSON, in his  
official capacity as the Commander, Fleet  
Forces Command; and CAPTAIN MIKE  
NORTIER, in his official capacity as  
Commanding Officer Naval Air Station  
Whidbey Island,

Defendants,

No. 2:13-cv-1232-TSZ

DECLARATION OF CAPTAIN MICHAEL  
NORTIER

I, Captain Michael Nortier, U.S. Navy, Commanding Officer, Naval Air Station Whidbey Island, do hereby declare as follows:

1. I have extensive experience in Navy operations and currently serve as Commanding Officer of Naval Air Station ("NAS") Whidbey Island. In my experience, shifting all Field Carrier Landing Practice ("FCLP") operations from Outlying Field ("OLF") Coupeville degrades the quality of

NORTIER DECLARATION

- 1 -

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7600 Sand Point Way NE  
Seattle, WA 981115

1 training for EA-18G pilots practicing for dangerous carrier landings; negatively impacts all other  
2 operations at NAS Whidbey Island; and increases impacts to the community near Ault Field.

## 3 BACKGROUND

4 2. I was commissioned as a Naval Officer through the Naval Reserve Officer Training Corps in  
5 1990, and was designated a Naval Aviator in 1991. Over the course of 25 years in the Navy, I  
6 have been assigned to various squadrons, have held numerous positions, and have embarked on  
7 many ships in support of deployed operations. I was particularly involved in aviation safety  
8 during my tour as the Air Operations Officer for Commander, Carrier Strike Group Seven,  
9 embarked on USS RONALD REAGAN (CVN 76) in 2009. In addition to my duties as Air  
10 Operations Officer, I served as Strike Group Seven Safety Officer, interacting with Carrier Air  
11 Wing FOURTEEN and USS RONALD REAGAN on all safety related matters, including  
12 aviation safety. This assignment included a deployment to the Arabian Gulf in 2009, Rim of the  
13 Pacific Exercise off the coast of Hawaii in 2010 and a Western Pacific deployment in 2011. I  
14 have also served on the staff of the U.S. Pacific Fleet in the Operations directorate and deployed  
15 with the Army to Iraq in 2012. Over the last 25 years I have accumulated over 4,300 flight hours  
16 in naval aircraft and have worked with a variety of platforms deployed to carriers and surface  
17 combatants.

## 18 NAS WHIDBEY ISLAND

19 3. I have been the Commanding Officer of NAS Whidbey Island since February 2013. As  
20 Commanding Officer, I have overall responsibility for all daily base facility and air operations on  
21 and around NAS Whidbey Island, which includes activities at Ault Field and Outlying Landing  
22 Field ("OLF") Coupeville. Both airfields are located on Whidbey Island, with the OLF  
23 approximately 10 miles south, by air, from Ault Field. I am responsible for executing,  
24 coordinating, and integrating shore installation services and support functional programs in  
25 support of Navy operational missions. NAS Whidbey Island is the only naval aviation  
installation in the Pacific Northwest. For over 40 years, NAS Whidbey Island has been the home  
of all Navy Electronic Attack (VAQ) squadrons in the United States. The VAQ community is  
made up of EA-18G "Growler" aircraft supporting Navy carrier fleet and Department of Defense  
expeditionary missions. The predecessor to the Growler was the EA-6B "Prowler."

4. Ault Field supports an average of 65,000 military operations a year, comprising operations  
from aircraft home-based at NAS Whidbey Island, including fourteen electronic attack  
squadrons, five maritime patrol and reconnaissance squadrons, one logistics squadron, and one  
search and rescue helicopter unit, as well as operations from other transient military aircraft.

## FIELD CARRIER LANDING PRACTICE

5. Unlike other aircraft takeoffs, which climb to altitude and depart the local area, aircraft  
conducting Field Carrier Landing Practice (FCLP) training take off and remain within 3-4 miles  
of the airfield during the entire evolution. When an FCLP period is occurring with multiple  
aircraft, this is generally considered a closed pattern, which means that other aircraft cannot take  
off or land.

## NORTIER DECLARATION

- 2 -

U.S. Department of Justice  
7600 Sand Point Way NE  
Seattle, WA 98115

## 1 OLF COUPEVILLE

2  
3 6. OLF Coupeville has one runway oriented generally North/South, and is called runway 32 or  
4 runway 14, depending on direction of approach. The weather and winds determine the direction  
5 in which to conduct FCLPs. The local prevailing winds support runway 32 usage most of the  
6 year. FCLP flight patterns for OLF Coupeville were historically used by the EA-6B and A-6  
7 aircraft, which shared similar flight characteristics. In the past, the flight pattern for runway 14  
8 was adjusted for noise abatement purposes for homes on the eastern coastal boundary.  
9 Additionally, noise abatement procedures were designed to avoid flying over Long Point and a  
10 bird farm that is no longer in existence, and those procedures are still followed. Even with these  
11 modifications to the pattern, the EA-6B and A-6 could operate within acceptable parameters and  
12 use runway 14 when the meteorological conditions favored this runway. The EA-18G has a  
13 slightly different required flight profile in the FCLP pattern due to differences in weight and  
14 flight characteristics. As a result, the EA-18G cannot safely operate within the confines of the  
15 daytime runway 14 parameters currently in place. The Navy is examining runway usage and  
16 historical noise abatement procedures as part of its ongoing EA-18G Environmental Impact  
17 Study. Until that study is complete, runway 14 is rarely used for FCLPs.

18  
19 7. I was in command of NAS Whidbey Island on June 28, 2013 when U.S. Fleet Forces halted  
20 flight operations at OLF Coupeville, and when FCLPs at OLF Coupeville resumed in January  
21 2014. Ault Field was utilized to meet most of the remaining FCLP training requirements for that  
22 year. The suspension of flight operations at OLF Coupeville created operational impacts that  
23 were not sustainable, either as a permanent solution or as a temporary solution extending much  
24 longer than what was experienced in 2013.

25 8. During November of 2013, as several squadrons conducted FCLPs in preparation for  
deploying on aircraft carriers, other aircraft awaiting departures and arrivals encountered  
extensive delays, in some cases greater than 45 minutes. The back-up of aircraft waiting to take  
off or land accumulates when closed-pattern FCLPs are conducted at Ault Field. Because  
FCLPs are so closely sequenced, non-FCLP aircraft must hold on the taxiway to await a gap in  
flying to safely depart. Backups on the airport taxiways due to FCLPs lead to missed training  
windows in military operations areas (MOAs) and military training routes (MTRs), which are  
tightly scheduled to meet the requirements of 20 squadrons assigned to NAS Whidbey Island.<sup>1</sup>  
In order to relieve the congestion on the ground in 2013, the air traffic controllers had to create  
space between airborne FCLP aircraft—to create an opening in what is normally a closed

<sup>1</sup> MOAs and MTRs are subsets of special use airspace (SUA) established by the FAA. They have specific  
vertical and horizontal boundaries within which military aircraft conduct training. NAS Whidbey Island  
schedules MOA and MTR use and deconflicts scheduling with other route users. NAS Whidbey Island  
provides flight altitudes, route widths, and times to Flight Service Stations, which in turn are responsible  
for providing that information to the general aviation public for safety. Therefore, in the interest of flight  
safety, and to allow sufficient time to disseminate the advisory information, MTR entry times are firm.  
Entry onto Instrument Route MTRs must be within five minutes, and entry onto Visual Route MTRs must  
be within three minutes of scheduled times. Missed SUA times results in missed training and, therefore,  
delays or degrades readiness.

NORTIER DECLARATION

- 3 -

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7600 Sand Point Way NE  
Seattle, WA 98115



1 pattern—so that other aircraft could take off or land. This lengthened the FCLP pattern so that  
 2 aircraft flew outside the standard FCLP patterns. This has a detrimental impact on FCLP  
 3 training, because the pattern being flown no longer closely resembles the pattern flown at sea. It  
 also means that FCLP aircraft fly over different locations in the community than under a  
 standard pattern, which tends to give rise to additional noise complaints.

4 9. The temporary closure of OLF Coupeville in 2013 stressed our capacity to meet training  
 5 requirements in order to support military readiness and caused a greater impact on the  
 6 community surrounding Ault Field. Having to schedule operations at Ault Field around FCLP  
 7 training results in extending the flight hours in a given day to perform other necessary flight  
 8 operations. This means flights occur later in the evening, which increases the duration of the  
 9 impact on the community.

10 10. The population surrounding Ault Field is greater than that surrounding OLF Coupeville,  
 11 which means noise impacts from aircraft operations at Ault Field impact a greater number of  
 12 people than at Coupeville.<sup>2</sup>

13 11. Plaintiff asserts that the Fleet Replacement Squadron (“FRS”) is using five aircraft in the  
 14 pattern during FCLP training. Training requirements only permit up to five aircraft during one  
 15 FCLP session; however, five aircraft are rarely scheduled because the FRS pilots are less  
 16 experienced at flying the Growler or flying in the vicinity of NAS Whidbey Island, so they will  
 17 normally only schedule up to four aircraft. FRS pilots are more likely to need this extra cushion  
 18 in order to keep the FCLP pattern within the lateral limits of the OLF.

#### 19 OLF COUPEVILLE NOISE ABATEMENT AND MITIGATION MEASURES

20 12. NAS Whidbey Island has established noise abatement and mitigation measures. These  
 21 measures consist of working with our local communities to modify flight operations to minimize  
 22 our impact when possible. My staff and I meet often with elected officials, school  
 23 representatives, and community organizations and groups. When schools notify us about their  
 24 testing schedules, we adjust our flights if weather conditions allow. During weekends, we  
 25 minimize flights at OLF Coupeville to limit disturbance. Additionally, in an attempt to make the  
 public more aware of our planned operations, we continue to publish flight schedules for OLF  
 Coupeville on the NAS Whidbey Island website and Facebook page, and in the local media  
 outlets such as Whidbey News Times one week in advance. We send this flight schedule to a  
 wide range of area media outlets to ensure maximum distribution of the information. In 2014,  
 we worked with the Mayor of Coupeville and Island County Commissioner to identify  
 community events and publish a planning schedule that covered the summer to allow the  
 community to be assured OLF Coupeville operations would not impact these events.

13. As Commanding Officer of NAS Whidbey Island, I make every effort to minimize the  
 Navy’s impact on surrounding communities when possible, recognizing that flight schedules are

<sup>2</sup> Population data shows that in 2010, Coupeville, Washington population was 1,831 and Oak  
 Harbor, Washington population was 22,075. See Attachment 1.

1 dictated by training and deployment schedules. NAS Whidbey Island practices noise abatement  
2 and mitigation procedures to control the routing of routine flights to minimize overflight of  
populated areas.

3 14. My staff and I work with the local communities to promote development compatible with air  
4 operations. The 2005 AICUZ provides Navy recommendations for compatible land use and is a  
publicly available document. This information is shared with the prospective home buyers in the  
area upon request, and it is also easily found online.

5  
6 15. Accident Potential Zones ("APZs") are planning tools for local planning agencies and are  
governed by Navy instruction (OPNAVINST 11010.36C). APZs are areas where an analysis of  
7 historical flight data shows an aircraft mishap is most likely to occur should one occur. They do  
not reflect the probability of an accident. Accidents near OLF Coupeville are very rare. APZs  
8 follow arrival, departure and pattern flight tracks. The requirement to establish APZs is  
dependent on the number of flight operations that occur in a particular flight track at the runway  
9 or airfield. Not all runways or airfields require an APZ. A runway or airfield requires APZs  
when 5,000 or more flight operations occur annually over a specific flight track. For purposes of  
10 APZs, a flight operation is considered a landing or a takeoff, but not both combined. In other  
words, an APZ is required if a flight track has 5,000 take offs or 5,000 landings, but not 2,500 of  
11 each. It should be noted that flight operations for FCLPs are calculated differently than  
operations for APZs. Each FCLP is counted twice, or two operations. One operation is the  
12 landing, and one is the takeoff. Accordingly, if OLF Coupeville experiences 6,120 FCLP  
operations, that would equate to 3,060 landings, and 3,060 takeoffs, which does not meet the  
13 5,000 take-off or landing threshold for establishment of an APZ for flight tracks at OLF  
Coupeville's runway 14 or runway 32. OLF Coupeville does not currently experience the  
14 requisite number of operations per flight track and, therefore, per Navy direction, does not  
require APZs.

15 OLF COUPEVILLE FCLP DATA

16 16. During the entire year of 2014, Navy aircraft conducted FCLPs at OLF Coupeville over 44  
17 days, all during the work week; of those 44 days, 14 days included acoustic night operations (that  
is, between 10 p.m. and 7 a.m.) with only two of the acoustic night operations extending past  
18 midnight (June 26 and Aug 12). Since January 2015, Navy aircraft have conducted FCLPs at  
OLF Coupeville for 20 days, all during the work week; of those 20 days, only one day included  
19 acoustic night and that single event ended at 10:57 p.m. Please see Attachment 2 for specific  
times that 2014 and 2015 FCLPs started and finished.

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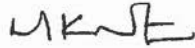
24

25 NORTIER DECLARATION

1 CONCLUSION

2 17. Significant changes such as enjoining FCLPs at OLF Coupeville will result in detrimental  
3 effects to airfield operations and military aircrew training, and increased impacts to the  
4 communities surrounding Ault Field.

4 I hereby swear under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing  
5 information is true and correct to the best of my knowledge.

6 

7 Michael Nortier  
8 Captain, U.S. Navy

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NORTIER DECLARATION

- 6 -

U.S. Department of Justice  
7600 Sand Point Way NE  
Seattle, WA 98115

**Attachment 1**

# Attachment 1

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Jan-14		Night Start	Night End	Total Day	Total Night	Total Day and Night	
			Start Time	End Time						
1							0:00	0:00	0:00	
2							0:00	0:00	0:00	
3							0:00	0:00	0:00	
4							0:00	0:00	0:00	
5							0:00	0:00	0:00	
6	14:32	19:20					4:48	0:00	4:48	
7							0:00	0:00	0:00	
8							0:00	0:00	0:00	
9							0:00	0:00	0:00	
10							0:00	0:00	0:00	
11							0:00	0:00	0:00	
12							0:00	0:00	0:00	
13	14:00	14:30	15:27	16:26			1:29	0:00	1:29	
14							0:00	0:00	0:00	
15	16:35	17:17					0:42	0:00	0:42	
16							0:00	0:00	0:00	
17							0:00	0:00	0:00	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27							0:00	0:00	0:00	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
31							0:00	0:00	0:00	
							<b>Monthly Total</b>	<b>6:59</b>	<b>0:00</b>	<b>6:59</b>

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Feb-14		Night Start	Night End	Total Day	Total Night	Total Day and Night	
			Start Time	End Time						
1							0:00	0:00	0:00	
2							0:00	0:00	0:00	
3							0:00	0:00	0:00	
4							0:00	0:00	0:00	
5							0:00	0:00	0:00	
6							0:00	0:00	0:00	
7							0:00	0:00	0:00	
8							0:00	0:00	0:00	
9							0:00	0:00	0:00	
10							0:00	0:00	0:00	
11							0:00	0:00	0:00	
12							0:00	0:00	0:00	
13							0:00	0:00	0:00	
14							0:00	0:00	0:00	
15							0:00	0:00	0:00	
16							0:00	0:00	0:00	
17							0:00	0:00	0:00	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27							0:00	0:00	0:00	
28							0:00	0:00	0:00	
							<b>Monthly Total</b>	0:00	0:00	0:00

**OLF FLIGHT HOURS**

Mar-14

Day	Start Time	End Time	Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night	
1							0:00	0:00	0:00	
2							0:00	0:00	0:00	
3							0:00	0:00	0:00	
4							0:00	0:00	0:00	
5							0:00	0:00	0:00	
6							0:00	0:00	0:00	
7							0:00	0:00	0:00	
8							0:00	0:00	0:00	
9							0:00	0:00	0:00	
10							0:00	0:00	0:00	
11							0:00	0:00	0:00	
12							0:00	0:00	0:00	
13							0:00	0:00	0:00	
14							0:00	0:00	0:00	
15							0:00	0:00	0:00	
16							0:00	0:00	0:00	
17							0:00	0:00	0:00	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27							0:00	0:00	0:00	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
31							0:00	0:00	0:00	
							<b>Monthly Total</b>	0:00	0:00	0:00



**OLF FLIGHT HOURS**

Apr-14

Day	Start Time	End Time	Start Time	End Time	Start Time	Night Start	Night End	Total Day	Total Night	Total Day and Night	
1								0:00	0:00	0:00	
2								0:00	0:00	0:00	
3								0:00	0:00	0:00	
4								0:00	0:00	0:00	
5								0:00	0:00	0:00	
6								0:00	0:00	0:00	
7								0:00	0:00	0:00	
8								0:00	0:00	0:00	
9								0:00	0:00	0:00	
10								0:00	0:00	0:00	
11								0:00	0:00	0:00	
12								0:00	0:00	0:00	
13								0:00	0:00	0:00	
14								0:00	0:00	0:00	
15								0:00	0:00	0:00	
16								0:00	0:00	0:00	
17								0:00	0:00	0:00	
18								0:00	0:00	0:00	
19								0:00	0:00	0:00	
20								0:00	0:00	0:00	
21								0:00	0:00	0:00	
22								0:00	0:00	0:00	
23								0:00	0:00	0:00	
24								0:00	0:00	0:00	
25	12:00	14:15						2:15	0:00	2:15	
26								0:00	0:00	0:00	
27								0:00	0:00	0:00	
28								0:00	0:00	0:00	
29								0:00	0:00	0:00	
30								0:00	0:00	0:00	
								<b>Monthly Total</b>	2:15	0:00	2:15

**OLF FLIGHT HOURS**

May-14							Total Day	Total Night	Total Day and Night
Day	Start Time	End Time	Start Time	End Time	Night Start	Night End			
1	20:45	22:00			22:00	23:07	1:15	1:07	2:22
2							0:00	0:00	0:00
3							0:00	0:00	0:00
4							0:00	0:00	0:00
5							0:00	0:00	0:00
6	14:06	16:11	21:04	22:00	22:00	23:09	3:01	1:09	4:10
7	19:08	21:09					2:01	0:00	2:01
8							0:00	0:00	0:00
9							0:00	0:00	0:00
10							0:00	0:00	0:00
11							0:00	0:00	0:00
12							0:00	0:00	0:00
13							0:00	0:00	0:00
14							0:00	0:00	0:00
15							0:00	0:00	0:00
16							0:00	0:00	0:00
17							0:00	0:00	0:00
18							0:00	0:00	0:00
19							0:00	0:00	0:00
20							0:00	0:00	0:00
21							0:00	0:00	0:00
22							0:00	0:00	0:00
23							0:00	0:00	0:00
24							0:00	0:00	0:00
25							0:00	0:00	0:00
26							0:00	0:00	0:00
27	14:06	17:29					3:23	0:00	3:23
28	19:48	22:00			22:00	23:27	2:12	1:27	3:39
29							0:00	0:00	0:00
30							0:00	0:00	0:00
31							0:00	0:00	0:00
<b>Monthly Total</b>							<b>11:52</b>	<b>3:43</b>	<b>15:35</b>

**OLF FLIGHT HOURS**

Jun-14

Day	Start Time	End Time	Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night
1							0:00	0:00	0:00
2							0:00	0:00	0:00
3	18:30	18:56					0:26	0:00	0:26
4	16:37	18:32					1:55	0:00	1:55
5	16:40	18:39					1:59	0:00	1:59
6							0:00	0:00	0:00
7							0:00	0:00	0:00
8							0:00	0:00	0:00
9							0:00	0:00	0:00
10							0:00	0:00	0:00
11							0:00	0:00	0:00
12							0:00	0:00	0:00
13							0:00	0:00	0:00
14							0:00	0:00	0:00
15							0:00	0:00	0:00
16							0:00	0:00	0:00
17	18:20	18:41					0:21	0:00	0:21
18							0:00	0:00	0:00
19	17:09	17:37					0:28	0:00	0:28
20	11:24	13:50					2:26	0:00	2:26
21							0:00	0:00	0:00
22							0:00	0:00	0:00
23	21:56	22:00			22:00	22:26	0:04	0:26	0:30
24	21:48	22:00			22:00	23:39	0:12	1:39	1:51
25	21:53	22:00			22:00	23:50	0:07	1:50	1:57
26					22:11	0:00	0:00	1:49	1:49
27					0:00	0:17	0:00	0:17	0:17
28							0:00	0:00	0:00
29							0:00	0:00	0:00
30					22:11	23:43	0:00	1:32	1:32
					<b>Monthly Total</b>		<b>7:58</b>	<b>7:33</b>	<b>15:31</b>

**OLF FLIGHT HOURS**

Jul-14

Day	Start Time	End Time	Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night
1							0:00	0:00	0:00
2	11:58	13:56					1:58	0:00	1:58
3							0:00	0:00	0:00
4							0:00	0:00	0:00
5							0:00	0:00	0:00
6							0:00	0:00	0:00
7	12:13	16:19					4:06	0:00	4:06
8							0:00	0:00	0:00
9							0:00	0:00	0:00
10							0:00	0:00	0:00
11							0:00	0:00	0:00
12							0:00	0:00	0:00
13							0:00	0:00	0:00
14							0:00	0:00	0:00
15							0:00	0:00	0:00
16							0:00	0:00	0:00
17							0:00	0:00	0:00
18							0:00	0:00	0:00
19							0:00	0:00	0:00
20							0:00	0:00	0:00
21							0:00	0:00	0:00
22							0:00	0:00	0:00
23							0:00	0:00	0:00
24							0:00	0:00	0:00
25							0:00	0:00	0:00
26							0:00	0:00	0:00
27							0:00	0:00	0:00
28							0:00	0:00	0:00
29							0:00	0:00	0:00
30	12:28	13:16					0:48	0:00	0:48
31							0:00	0:00	0:00
						<b>Monthly Total</b>	6:52	0:00	6:52

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Start Time	End Time	Aug-14		Night Start	Night End	Total Day	Total Night	Total Day and Night
					Start Time	End Time					
1									0:00	0:00	0:00
2									0:00	0:00	0:00
3									0:00	0:00	0:00
4									0:00	0:00	0:00
5									0:00	0:00	0:00
6									0:00	0:00	0:00
7									0:00	0:00	0:00
8									0:00	0:00	0:00
9									0:00	0:00	0:00
10									0:00	0:00	0:00
11	19:14	21:10							1:56	0:00	1:56
12	15:43	17:36	19:12	22:00			22:00	0:00	4:41	2:00	6:41
13							0:00	0:30	0:00	0:30	0:30
14									0:00	0:00	0:00
15									0:00	0:00	0:00
16									0:00	0:00	0:00
17									0:00	0:00	0:00
18	8:29	11:38	20:13	22:00			22:00	23:59	4:56	1:59	6:55
19	20:42	22:00					22:00	0:00	1:18	2:00	3:18
20									0:00	0:00	0:00
21	20:44	22:00					22:00	23:54	1:16	1:54	3:10
22	11:33	14:38							3:05	0:00	3:05
23									0:00	0:00	0:00
24									0:00	0:00	0:00
25	17:35	18:03	20:19	22:00			22:00	23:56	2:09	1:56	4:05
26	15:25	17:24	20:22	21:04					2:41	0:00	2:41
27	17:38	18:07	19:21	20:51					1:59	0:00	1:59
28	13:35	14:09	15:01	15:36	16:22	17:01			1:48	0:00	1:48
29									0:00	0:00	0:00
30									0:00	0:00	0:00
31									0:00	0:00	0:00
								<b>Monthly Total</b>	25:49	10:19	36:08

**OLF FLIGHT HOURS**

Sep-14										
Day	Start Time	End Time	Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night	
1							0:00	0:00	0:00	
2							0:00	0:00	0:00	
3	15:46	16:17	16:36	17:08			1:03	0:00	1:03	
4	16:31	17:18					0:47	0:00	0:47	
5							0:00	0:00	0:00	
6							0:00	0:00	0:00	
7							0:00	0:00	0:00	
8							0:00	0:00	0:00	
9	15:36	17:34					1:58	0:00	1:58	
10	15:49	16:19					0:30	0:00	0:30	
11	15:39	17:21					1:42	0:00	1:42	
12							0:00	0:00	0:00	
13							0:00	0:00	0:00	
14							0:00	0:00	0:00	
15							0:00	0:00	0:00	
16							0:00	0:00	0:00	
17							0:00	0:00	0:00	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27							0:00	0:00	0:00	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
							<b>Monthly Total</b>	<b>6:00</b>	<b>0:00</b>	<b>6:00</b>

**OLF FLIGHT HOURS**

Day	Oct-14							Total Day	Total Night	Total Day and Night
	Start Time	End Time	Start Time	End Time	Start Time	End Time	Night Start			
1							0:00	0:00	0:00	
2							0:00	0:00	0:00	
3	10:51	11:47	12:18	14:40	18:31	21:37	6:24	0:00	6:24	
4							0:00	0:00	0:00	
5							0:00	0:00	0:00	
6							0:00	0:00	0:00	
7							0:00	0:00	0:00	
8							0:00	0:00	0:00	
9							0:00	0:00	0:00	
10							0:00	0:00	0:00	
11							0:00	0:00	0:00	
12							0:00	0:00	0:00	
13							0:00	0:00	0:00	
14							0:00	0:00	0:00	
15							0:00	0:00	0:00	
16							0:00	0:00	0:00	
17	10:28	14:39					4:11	0:00	4:11	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20	18:30	19:15	19:48	22:00			2:57	0:05	3:02	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27							0:00	0:00	0:00	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
31							0:00	0:00	0:00	
							<b>Monthly Total</b>	13:32	0:05	13:37

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Nov-14		Night Start	Night End	Total Day	Total Night	Total Day and Night	
			Start Time	End Time						
1							0:00	0:00	0:00	
2							0:00	0:00	0:00	
3							0:00	0:00	0:00	
4							0:00	0:00	0:00	
5							0:00	0:00	0:00	
6							0:00	0:00	0:00	
7							0:00	0:00	0:00	
8							0:00	0:00	0:00	
9							0:00	0:00	0:00	
10							0:00	0:00	0:00	
11							0:00	0:00	0:00	
12							0:00	0:00	0:00	
13							0:00	0:00	0:00	
14							0:00	0:00	0:00	
15							0:00	0:00	0:00	
16							0:00	0:00	0:00	
17							0:00	0:00	0:00	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27							0:00	0:00	0:00	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
							<b>Monthly Total</b>	0:00	0:00	0:00



**OLF FLIGHT HOURS**

Dec-14									
Day	Start Time	End Time	Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night
1	11:30	14:00	17:00	19:15			4:45	0:00	4:45
2	11:45	14:00					2:15	0:00	2:15
3							0:00	0:00	0:00
4							0:00	0:00	0:00
5							0:00	0:00	0:00
6							0:00	0:00	0:00
7							0:00	0:00	0:00
8							0:00	0:00	0:00
9							0:00	0:00	0:00
10							0:00	0:00	0:00
11							0:00	0:00	0:00
12							0:00	0:00	0:00
13							0:00	0:00	0:00
14							0:00	0:00	0:00
15							0:00	0:00	0:00
16	15:15	16:00					0:45	0:00	0:45
17							0:00	0:00	0:00
18	9:46	13:05					3:19	0:00	3:19
19							0:00	0:00	0:00
20							0:00	0:00	0:00
21							0:00	0:00	0:00
22							0:00	0:00	0:00
23							0:00	0:00	0:00
24							0:00	0:00	0:00
25							0:00	0:00	0:00
26							0:00	0:00	0:00
27							0:00	0:00	0:00
28							0:00	0:00	0:00
29							0:00	0:00	0:00
30							0:00	0:00	0:00
31							0:00	0:00	0:00
<b>Monthly Total</b>							11:04	0:00	11:04

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Jan-15		Night Start	Night End	Total Day	Total Night	Total Day and Night	
			Start Time	End Time						
1							0:00	0:00	0:00	
2							0:00	0:00	0:00	
3							0:00	0:00	0:00	
4							0:00	0:00	0:00	
5							0:00	0:00	0:00	
6	15:03	16:03					1:00	0:00	1:00	
7							0:00	0:00	0:00	
8	15:04	15:47					0:43	0:00	0:43	
9							0:00	0:00	0:00	
10							0:00	0:00	0:00	
11							0:00	0:00	0:00	
12							0:00	0:00	0:00	
13							0:00	0:00	0:00	
14	15:05	15:44	17:52	19:30			2:17	0:00	2:17	
15							0:00	0:00	0:00	
16							0:00	0:00	0:00	
17							0:00	0:00	0:00	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27							0:00	0:00	0:00	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
31							0:00	0:00	0:00	
							<b>Monthly Total</b>	<b>4:00</b>	<b>0:00</b>	<b>4:00</b>

**OLF FLIGHT HOURS**

Day	Start Time	End Time	Feb-15			Total Day	Total Night	Total Day and Night
			Start Time	End Time	Night End			
1						0:00	0:00	0:00
2						0:00	0:00	0:00
3						0:00	0:00	0:00
4						0:00	0:00	0:00
5						0:00	0:00	0:00
6						0:00	0:00	0:00
7						0:00	0:00	0:00
8						0:00	0:00	0:00
9						0:00	0:00	0:00
10						0:00	0:00	0:00
11						0:00	0:00	0:00
12						0:00	0:00	0:00
13						0:00	0:00	0:00
14						0:00	0:00	0:00
15						0:00	0:00	0:00
16						0:00	0:00	0:00
17						0:00	0:00	0:00
18						0:00	0:00	0:00
19						0:00	0:00	0:00
20						0:00	0:00	0:00
21						0:00	0:00	0:00
22						0:00	0:00	0:00
23						0:00	0:00	0:00
24						0:00	0:00	0:00
25						0:00	0:00	0:00
26						0:00	0:00	0:00
27						0:00	0:00	0:00
28						0:00	0:00	0:00
					<b>Monthly Total</b>	0:00	0:00	0:00

**OLF FLIGHT HOURS**

Day	Mar-15												Total Day	Total Night	Total Day and Night
	Start Time	End Time	Start Time	End Time	Start Time	End Time	Start Time	End Time	Start Time	End Time	Night Start	Night End			
1													0:00	0:00	0:00
2													0:00	0:00	0:00
3													0:00	0:00	0:00
4													0:00	0:00	0:00
5													0:00	0:00	0:00
6													0:00	0:00	0:00
7													0:00	0:00	0:00
8													0:00	0:00	0:00
9													0:00	0:00	0:00
10													0:00	0:00	0:00
11													0:00	0:00	0:00
12													0:00	0:00	0:00
13	11:00	21:45	12:30	13:15									1:30	0:00	1:30
14													0:00	0:00	0:00
15													0:00	0:00	0:00
16	13:30	14:05	14:24	15:38	15:44	16:28	17:35	21:35					6:33	0:00	6:33
17	10:10	13:45	13:55	14:30	15:16	15:59	19:36	20:09	20:58	21:30			5:58	0:00	5:58
18	20:00	20:50											0:50	0:00	0:50
19	19:32	21:48											2:16	0:00	2:16
20													0:00	0:00	0:00
21													0:00	0:00	0:00
22													0:00	0:00	0:00
23													0:00	0:00	0:00
24	10:30	14:00											3:30	0:00	3:30
25													0:00	0:00	0:00
26	18:12	21:26											3:14	0:00	3:14
27	11:00	14:42											3:42	0:00	3:42
28													0:00	0:00	0:00
29													0:00	0:00	0:00
30	18:10	19:31											1:21	0:00	1:21
31	10:57	14:10											3:13	0:00	3:13
	<b>Monthly Total</b>												<b>32:07</b>	<b>0:00</b>	<b>32:07</b>

**OLF FLIGHT HOURS**

Apr-15										
Day	Start Time	End Time	Start Time	End Time	Night Start	Night End	Total Day	Total Night	Total Day and Night	
1	18:10	21:30					3:20	0:00	3:20	
2	11:21	14:23	18:00	21:28			6:30	0:00	6:30	
3							0:00	0:00	0:00	
4							0:00	0:00	0:00	
5							0:00	0:00	0:00	
6	18:06	21:40					3:34	0:00	3:34	
7							0:00	0:00	0:00	
8	10:40	14:09					3:29	0:00	3:29	
9	13:40	14:30	18:50	19:33			1:33	0:00	1:33	
10							0:00	0:00	0:00	
11							0:00	0:00	0:00	
12							0:00	0:00	0:00	
13							0:00	0:00	0:00	
14							0:00	0:00	0:00	
15							0:00	0:00	0:00	
16	19:15	22:00			22:00	22:57	2:45	0:57	3:42	
17							0:00	0:00	0:00	
18							0:00	0:00	0:00	
19							0:00	0:00	0:00	
20							0:00	0:00	0:00	
21							0:00	0:00	0:00	
22							0:00	0:00	0:00	
23							0:00	0:00	0:00	
24							0:00	0:00	0:00	
25							0:00	0:00	0:00	
26							0:00	0:00	0:00	
27	19:04	20:46					1:42	0:00	1:42	
28							0:00	0:00	0:00	
29							0:00	0:00	0:00	
30							0:00	0:00	0:00	
							<b>Monthly Total</b>	<b>22:53</b>	<b>0:57</b>	<b>23:50</b>

Annual Total			
2014			
Month	Day	Night	Total
January	6:59	0:00	6:59
February	0:00	0:00	0:00
March	0:00	0:00	0:00
April	2:15	0:00	2:15
May	11:52	3:43	15:35
June	7:58	7:33	15:31
July	6:52	0:00	6:52
August	25:49	10:19	12:08
September	6:00	0:00	6:00
October	13:32	0:05	13:37
November	0:00	0:00	0:00
December	11:04	0:00	11:04
Totals	92:21	21:40	114:01

Annual Total			
2015			
Month	Day	Night	Total
January	4:00	0:00	4:00
February	0:00	0:00	0:00
March	32:07	0:00	32:07
April	22:53	0:57	23:50
Totals	59:00	0:57	59:57

State of Washington  
**2014 Population Trends**



**Forecasting & Research Division  
Office of Financial Management  
November 2014**

Table 4 *continued***Populations of Cities, Towns, and Counties: April 1, 2010 to April 1, 2014**

<b>County Municipality</b>	<b>Census 2010</b>	<b>Estimate 2011</b>	<b>Estimate 2012</b>	<b>Estimate 2013</b>	<b>Estimate 2014</b>
<b>Douglas</b>	<b>38,431</b>	<b>38,650</b>	<b>38,900</b>	<b>39,280</b>	<b>39,700</b>
Unincorporated	20,399	20,590	20,760	21,060	21,430
Incorporated	18,032	18,060	18,140	18,220	18,270
Bridgeport	2,409	2,405	2,415	2,425	2,445
Coulee Dam <i>part</i>	187	185	185	185	185
East Wenatchee	13,190	13,220	13,280	13,350	13,370
Mansfield	320	320	325	325	325
Rock Island	788	790	790	790	790
Waterville	1,138	1,140	1,145	1,145	1,155
<b>Ferry</b>	<b>7,551</b>	<b>7,600</b>	<b>7,650</b>	<b>7,650</b>	<b>7,660</b>
Unincorporated	6,478	6,520	6,565	6,555	6,560
Incorporated	1,073	1,080	1,085	1,095	1,100
Republic	1,073	1,080	1,085	1,095	1,100
<b>Franklin</b>	<b>78,163</b>	<b>80,500</b>	<b>82,500</b>	<b>84,800</b>	<b>86,600</b>
Unincorporated	13,491	13,665	13,820	13,160	12,820
Incorporated	64,672	66,835	68,680	71,640	73,780
Conneil	4,209	5,150	5,320	5,350	5,330
Kahlotus	193	190	195	195	185
Mesa	489	495	495	495	495
Pasco	59,781	61,000	62,670	65,600	67,770
<b>Garfield</b>	<b>2,266</b>	<b>2,250</b>	<b>2,250</b>	<b>2,250</b>	<b>2,240</b>
Unincorporated	841	835	840	850	845
Incorporated	1,425	1,415	1,410	1,400	1,395
Pomeroy	1,425	1,415	1,410	1,400	1,395
<b>Grant</b>	<b>89,120</b>	<b>90,100</b>	<b>91,000</b>	<b>91,800</b>	<b>92,900</b>
Unincorporated	40,134	40,395	40,790	40,956	41,470
Incorporated	48,986	49,705	50,210	50,844	51,430
Coulee City	562	565	560	570	565
Coulee Dam <i>part</i>	0	0	0	0	0
Electric City	968	1,065	995	1,010	1,010
Ephrata	7,664	7,690	7,750	7,870	7,930
George	501	690	700	720	720
Grand Coulee	988	1,020	1,035	1,045	1,050
Hartline	151	150	150	155	155
Krupp	48	50	50	50	50
Maltawa	4,437	4,460	4,495	4,540	4,460
Moses Lake	20,366	20,640	20,950	21,250	21,600
Quincy	6,750	6,815	6,945	7,000	7,235
Royal City	2,140	2,150	2,160	2,190	2,210
Soap Lake	1,514	1,515	1,520	1,530	1,530
Warden	2,692	2,690	2,695	2,705	2,710
Wilson Creek	205	205	205	209+	205
<b>Grays Harbor</b>	<b>72,797</b>	<b>72,900</b>	<b>73,150</b>	<b>73,200</b>	<b>73,300</b>
Unincorporated	28,438	28,555	28,610	28,615	28,635
Incorporated	44,359	44,345	44,540	44,585	44,665
Aberdeen	16,896	16,870	16,890	16,860	16,850
Cosmopolis	1,649	1,645	1,640	1,650	1,645
Elma	3,107	3,115	3,110	3,115	3,130
Hoquiam	8,726	8,650	8,655	8,620	8,625
McCleary	1,653	1,655	1,655	1,655	1,660
Montesano	3,976	4,010	4,050	4,070	4,075
Oakville	684	685	690	690	690
Ocean Shores	5,569	5,615	5,745	5,815	5,880
Westport	2,099	2,100	2,105	2,110	2,110
<b>Island</b>	<b>78,506</b>	<b>78,800</b>	<b>79,350</b>	<b>79,700</b>	<b>80,000</b>
Unincorporated	53,565	53,700	54,215	54,665	55,080
Incorporated	24,941	25,100	25,135	25,035	24,910
Coupeville	1,831	1,855	1,880	1,890	1,895
Langley	1,035	1,045	1,055	1,065	1,075
Oak Harbor	22,075	22,200	22,200	22,080	21,940





WHIDBEY

# news·times

Appendix E-1

VOLUME 75

Oak Harbor and Coupeville, Washington, Thursday, January 26, 1967

NUMBER 19

## Navy Works On Coupeville Strip

The navy conducted flight operations on Coupeville's airstrip January 5 for the first time in several years.

Three A6A Intruders from Heavy Attack Squadron 123 logged 42 "bounces" and established the A6A flight pattern for field carrier landing practice. More work is being done to equip the airstrip for carrier practice "touch and go" landings. The navy expects to have the field in full operations for day and night landings by July 1.

The central Whidbey field, almost completely abandoned by the

navy 3½ years ago, is being activated to ease the crowded traffic pattern at Ault Field brought on by the addition of A6A Intruder squadrons. Intruders and A3B twin jet Skywarriors will use the Coupeville strip for day and night landings.

Navy crews cleaned and checked the Coupeville runways last December. After the runway is painted, the field can accommodate day-time landings by Intruder aircraft.

The larger and heavier Skywar-

riors cannot use the field until arresting gear is installed. This gear should be in place about mid-February.

Installation of runway lights is expected in March to allow night landings. Other equipment for full-time operations should be installed by July. At present, the navy does not plan to base personnel at Coupeville overnight.

The navy stated that 80,000 landings at Coupeville are predicted for fiscal year 1968, with a yearly average after that of about 100,000 landings.



WHIDBEY

# news·times

Appendix E-3

VOLUME 75

Oak Harbor and Coupeville, Washington, Thursday, August 3, 1967

NUMBER 46

## Coupeville Airstrip Readied For Operations

The Coupeville airstrip is nearly ready for touch and go landings, and these familiarization and carrier landing practices by the navy are expected to begin early this month.

The navy reported last Thursday that it was resealing the joints of the field, and that the strip could

actually be used now at night. Full-time day and night practices are expected in September.

The Coupeville strip is being reactivated by the navy after it was almost completely abandoned several years ago. Opening of the mid-Whidbey field will take a load off Aul Field where the airways

have become crowded.

A majority of the pilots practicing at Coupeville will be flying the A6A Intruder, the navy's all-weather medium attack bomber which has had an impressive record of performance in Vietnam.

All landings at Coupeville will be the touch and go type. The

planes will come down, touch field and then take off.

Pilots will begin their training with familiarization type landings to get used to the approach. Then, they will go to carrier landing practices.

Most familiarization landings are accomplished with an instructor in the plane and radioman on the ground both monitoring the pilot. For carrier practices, the Coupeville strip will have an outline of a carrier deck on the runway and lights that will outline the dimensions of a carrier deck for night landings.

The Coupeville strip will have emergency arresting gear just in case planes are forced to land. It is expected that planes will only land in emergencies.

The field will also have radios at both ends of the runway and an optical landing system indicating the proper glide slope for carrier landings.

Appendix E-~~A~~

WHIDBEY

news·times

AE 76

Oak Harbor and Coupeville, Washington, Thursday September 21, 1967

NUMBER 1

# Coupeville Flights Curtailed

Flight operations until early morning hours by Whidbey Island Naval Air Station jets at the Coupeville field produced some unhappy people in the Coupeville area this past week.

Relief is immediate, however, according to Captain Homer (Ken) Cooley, Commander Fleet Air, Whidbey operations officer. It is anticipated that the Coupeville field will not be used at night for the next two weeks, and thereafter

no later than midnight.

The Coupeville field was recently reactivated to handle increased training requirements for the A6A medium jet attack squadrons and the A2B heavy jet attack-aerial refueler squadrons.

Because several squadron units are preparing to deploy, the number of field carrier landing practice "bounces" at the field and at Ault Field was abnormally high last week.

Referring to the amount of Coupeville air traffic last week, Captain Cooley said, "Most of the time — for most of the year, as a matter of fact — we can accommodate this night training practice at Ault Field. However, at times there is a heavy concentration of flying which must be done just prior to units deploying to aircraft carriers.

"Such was the case last week. Several units are preparing to deploy and the number of flights scheduled was too much to handle at Ault Field; therefore the overload was flown at Coupeville field."

Commander Fleet Air, Whidbey's policy dictates using Coupeville field for night operations only when traffic is so heavy that it cannot be accommodated at Ault Field.

Training operations lasted until morning hours at Coupeville two nights last week, but continued that late five nights at Ault Field.

Captain Cooley added, "You can be sure that flights will end earlier as we go into fall and winter because the increased hours of darkness will enable us to begin flying earlier."

# WHIDBREY NEWS-TIMES

Appendix E-4

Serving North and Central Whidbey Island

WEDNESDAY, NOVEMBER 4, 1987

VOLUME 84, NUMBER 11

DAK HANSON, WASHINGTON 98277

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Squadle attorney Michael Gaudier (at left) addresses the WISE crowd, but weak, while (at right) Dan Stuck, WISE publicist and spokesperson, makes some additional points.



## Anti-noise group launches three-prong attack

By Mary Kay Dworky

Shift supporter organized. From a handful of noise-averse residents meeting in Bruce Park's living room, Whidbey Island's Whidbey Environmental WISE, has grown into a tax-exempt, nonprofit corporation with about 180 dues-paying members and a mailing list of more than 200 households.

WISE has launched an aggressive membership drive and a campaign to contribute to pay for litigation against the Navy — the great effort of the group's three-prong effort to "restore" livability on Central Whidbey, where Navy jet operations have crowded 30 percent over the island's carrying capacity.

More than 400 people attended a WISE meeting last Tuesday, when plans for legal and other action were discussed.

of an environmental impact statement on the Navy's Air Installation Compatible Use Zones (AICUZ) could be taken under the National Environmental Protection Act (NEPA) initiative by Cooper's attorney Ken Pridmore to address the WISE meeting. Pridmore also has filed a petition for declaratory judgment and condemnation of the AICUZ study, claiming devaluation of residential property by jet noise.

The group has not yet retained a lawyer, but WISE legal committee chairman Will Jones said he hopes to meet with a lawyer next week. Jones said the group's three-prong effort to "restore" livability on Central Whidbey, where Navy jet operations have crowded 30 percent over the island's carrying capacity.

Tom Pouch, WISE's Navy Liaison committee chairman, said direct negotiations were "going at a snail's pace." But that he thought they could be productive. Pouch, a Coupeville resident, asked noise zone residents to let him know how many flights per day they can tolerate for purposes of negotiation.

Political action committee chairman Dennis Argent, said the state's congressional delegation reported receiving "stacks of letters," and he urged members to keep writing their elected representatives.

If direct negotiation and political action aren't enough, said Jones, a ribbon-cutting lawsuit might get the attention of the government. He said his rough estimate was based on an average of 100 flights per day over the island's carrying capacity.

potential zones in town. NAS Whidbey commanding officer Capt. Dave Williams wrote the town in July saying the Navy can't comply with the regulation, and urging town officials to cooperate in AICUZ planning efforts.

Under the WISE plan, Pridmore at the meeting said, "I would suggest we attempt to establish a dialogue with the Navy" for direct negotiations would continue, and pressure would continue to be put on local, state and federal elected officials to help solve the problem.

The problem, WISE cites, is that operations have increased drastically and are expected to continue to increase at the Coupeville OLF, said residents of some areas — including Admiralty Cove — are regularly exposed to average noise levels of 120-130 decibels.

Like in a measure of the day-night average sound level in decibels, with night-time noise weighted as extra 10 decibels, because of its greater intrusiveness.

In his Air Installation Compatible Use Study (AICUZ), Gen. Navy Gen. Lee said the Navy "should be aware of adverse noise effects."

Gaudier said the noise is negatively affecting the quality of life of the island's residents. He said the noise is also affecting the island's economy.

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# WHIDBEY NEWS-TIMES

Spring North and Central Whidbey Island

WEDNESDAY, NOVEMBER 4, 1987

VOLUME 84, NUMBER 11

OAK HARBOR, WASHINGTON 98277

34 CENTS PER COPY

## Anti-noise group launches three prong attack

(Continued from page 1)

100 Union Square, Seattle, Wash.

Advocating the WISE group that a NERPA suit could force the Navy to go to court to defend its use of the area. The group also has a plan, which opens up the area to other uses, as well as undeveloped areas. Gendler said studies have shown that noise levels above 140 db can cause hearing loss, and that it's cumulative.

"Every time these planes fly over, you are taking a little bit of your hearing away," Gendler said. "If you are back, and Gendler adding that noise levels capable of causing hearing loss can also cause irritation, sleep interruption, nervous disorders and even mental illness."

He advised people to keep records of unusual events — such as stress patterns or out of their prescribed pattern. Gendler said that the problem is not just the noise, but the fact that the noise is constant. "It's not just a few hours a day, but as important, documentation, he said.

Gendler even recommended noise zone residents tape record the jet's noise for possible demonstration for a jury if a lawsuit should go to trial. A recording of conversations being overheard by the noise zone is being done. Gendler said that the noise zone is a fact, he said.

Because continued use of OLP is essential to NAS Whidbey's mission, Navy officials say, the county and cities of Coupeville and Oak Harbor should change the zoning of residential land under the flight patterns for more compatible uses and activities. "We're going to get this thing worked out so that all of us will have a livable environment," said Bardwell.

That "down-zoning," Gendler said, is the Navy's way of shifting the cost of their noise from them to you.

WISE members have said that some people in the noise zone want to move because they can't stand the noise from the stepped-up operations at OLP, but that it's hard to find buyers for their homes.

But WISE president Steve Bardwell said the group last week that he finally sold his home in the noise zone, on Morris Road, to a couple from New Jersey — and that he's made an offer on property in Race Lagoon.

Bardwell said he knows Race Lagoon is also in a noise zone but that he was confident the Navy would govern around the conflict between residential development and the Navy's use of the OLP property.

"We're going to get this thing worked out so that all of us will have a livable environment," said Bardwell.

In an interview about distributed by WISE, the group asks people to "think beyond the noise problem to the issue of quality of life and the environment," said WISE president Steve Bardwell. He said that the Navy aircraft have crashed in the last 12 months.

None of those tragedies, involving a 4-lander attack bombers occurred on the island, but in December 1984 an EA-6B Prowler — a tactical electronic warfare aircraft — crashed on the island. The Prowler was carrying the crew of two naval officers. No one else was hurt.

Navy officials have stressed the importance of keeping residential development from encroaching into accident-prone areas and have not ruled out the possibility of buying development rights, but no agreement has been reached.

Other measures the Navy seeks are requirements for noise attenuation in construction, and for full disclosure of noise levels and accident potential ratings in prospective land purchases.

WISE says these measures are too little too late in already developed areas.

In Admiral's Cove, for example, there are about 120 houses, said neighborhood resource committee chairman Forrest and Ann Davis. Mr. Davis has volunteered the use of his home computer for WISE research and computer production. He said that the noise zone is a fact, he said.

After last Tuesday's meeting was adjourned, hours of speculation followed a vote on the use of the OLP. Several that was a search for a solution. "We're going to get this thing worked out so that all of us will have a livable environment," said Bardwell.

The residents presenting the noise zone were called anti-Navy and an American.

Then-remaining officer of NAS Fallon Capt Dick Toli was interviewed along with several residents of Duvall Valley where litigation over jet noise including some homes owned by the Navy is pending.

Toli, who is now Rear Admiral Fred Mier's chief of staff for the Pacific Air Wing, attended last week's WISE meeting, but didn't address the group. WISE vice president Jim Burns said Toli introduced himself and they had a brief conversation after the meeting.

Appendix E-5

Saturday, May 9, 1992 • Whidbey News-Times • Page A7

## County supported Navy during '87 controversy

By Jim Thomsen  
Staff reporter

Nearly five years ago, supporters of the Navy and opponents of Navy aircraft noise had a showdown before the Island County Board of Commissioners.

Pressed to take a stand, commissioners Dick Caldwell, Dwain Colby and Gordon Koetje — the same who will preside at a public hearing Monday on the issue — lent their unanimous,

though somewhat reluctant, support for the Navy.

The Navy was looking at siting new attack squadrons at one of their west coast naval air stations — either on Whidbey Island or at Lemoore, Calif.

The Navy's decision hinged, in part, on the support of the local community for such an expansion here.

A vital part of that support was an on-the-record, unanimous endorsement of continued operation of the Navy's carrier-

landing field at Coupeville by the county commissioners.

Basic supporters and aircraft noise opponents, including the then-newly formed Whidbey Islanders For A Sound Environment, prepared high-profile campaigns aimed at the commissioners' endorsement.

While Caldwell and Koetje had indicated they were inclined to support the Navy, Colby was leaning the other way.

Colby had written a confiden-

tial memo to former NAS Whidbey Cmdr. Dave Williams earlier. In the memo, Colby proposed the county ban new residential development around Ault Field in exchange for Navy abandonment of OLF Coupeville.

Pressed for his views during the public hearing, however, Colby said: "I don't think there's any question but that we all do (support the Navy)."

Williams and other Navy officials pledged to continue study-

ing feasible alternatives to OLF Coupeville and implemented Air Installation Compatible Use Zoning (AICUZ) guidelines.

WISE attorney Ken Pickard later said his group was contemplating a conflict-of-interest lawsuit against Koetje because he owns land in the disputed zones. No action was ever filed.

NAS Whidbey received the new squadrons, and the number of flights within the noise zones more than doubled from 13,000 annually to more than 30,000.

## WISE testifies in San Francisco; suggests skepticism in numbers

By CRAIG DENNIS  
Publisher

SAN FRANCISCO - James Burns, president of Whidbey Islanders for a Sound Environment (WISE), told the Base Closure and Realignment Commission to review with skepticism numbers supplied in support of keeping NAS Whidbey open.

Burns was speaking for his organization as well as three other regional environmental groups concerned with noise encroachment in north Puget Sound.

WISE was allotted five minutes by the local task force midway through their 75-minute presentation.

"I'm not terribly happy to be sitting here in the camp of the enemy," said Burns. "Our group is not opposed to the Navy on the island."

But he said his group believes the Navy has not done an adequate job of addressing their environmental concerns.

Burns told the commission about last week's WISE membership vote in favor of the Navy's decision to close NAS Whidbey.

"We are not against the

Navy," he said. "We are for solving some problems."

He said his group believes NAS Whidbey is too small for adequate training operations. In support, he cited that NAS Whidbey has approximately 5,000 acres compared to 18,000 owned by the Navy at Lemoore, Calif., the proposed receiving base for the A-6 and EA-6B communities.

**EDITOR'S NOTE:** Craig Dennis, publisher of the Whidbey News-Times, is a member of the Save NAS Whidbey Task Force. He prepared the reports from San Francisco.

Appendix E-7



News of interest  
to the Coupeville area—  
Mary Strydom, Editor  
\* \* \*

Thursday, October 30, 1969

**Coupeville Field**

Navy flights are scheduled Monday through Sunday, most work at the Coupeville field. All flights resumed this week. The field will be in use from 8 a.m. until approximately 1 p.m. each night.



**APPENDIX F: 2016-06-25 E-MAIL FROM CAPTAIN GEOFFREY MOORE, USN**

**From:** Moore, Geoffrey C CAPT CO NAS Whidbey Is, N00  
**To:** [Helen Price Johnson](#)  
**Subject:** RE: this is madness -  
**Date:** Saturday, June 25, 2016 8:40:21 AM  
**Attachments:** [smime.p7s](#)

---

Commissioner Johnson,

It's been a busy week prepping for our open house and we are fighting a stomach bug in our family, so apologize for the delay in my response. Finally, in the calm before the open house starts, I have an opportunity to address correspondence.

Mayor Hughes discussed this farm with me as well, and I have listened to Mrs. Bartlett's comments to the Island Board of Health. I review our noise complaints daily so I can understand the impact on our local communities, so I appreciate you forwarding this e-mail.

As mentioned at our Tuesday discussion, there was acknowledgement that our nighttime FCLP requirements would most likely cause sleep disturbance of residents around OLF Coupeville. Coinciding schedules of two carriers has forced us to use both Ault Field at NAS Whidbey and OLF Coupeville this last week to get our pilots the necessary training prior to conducting at sea operations. Meeting the requirements of two squadrons did not allow us to alternate between the fields each night to provide some relief to the citizens who live near each respective airport. The timing with Summer Solstice was truly unfortunate. We have additional operations next week, but currently only plan one night at OLF Coupeville and four nights at Ault Field. The night operations at OLF Coupeville should be complete by midnight.

I discussed the downwind altitude with my operations officer after our discussion on Tuesday, and confirmed that the daytime altitude of 800 feet and the nighttime altitude of 1,200 feet has not changed in as far back as they have been stationed at NAS Whidbey Island. These altitudes are the same ones that we fly at the carrier, and with the precision requirements of that difficult task, the best training is achieved when we can duplicate the sight picture of the same altitude as the carrier pattern.

As of this morning, we have flown 3,906 operations of our NEPA allowance of 6,120 operations. That translates into 56 hours and 7 minutes total flight time at OLF Coupeville since January 1st; 5 hours and 14 minutes of that total has been flown between 10 p.m. and midnight. (~four hours this last week, and a little over an hour in May.) We continue to closely monitor our utilization of OLF Coupeville, and I look forward to working with you, the Island County Commissioners, and other elected leaders in our local area to be able to meet our local training requirements with the least impact possible to our surrounding areas.

Once again, thank you for the meeting invitation last week as well as the continued dialog. Sincerely,

CAPT Geoff 'Jefe' Moore  
Commanding Officer, NAS Whidbey Island  
Geoffrey.Moore@navy.mil  
Office Phone: 360.257.2037

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-----Original Message-----

From: Helen Price Johnson [[mailto:H.Price\\_Johnson@co.island.wa.us](mailto:H.Price_Johnson@co.island.wa.us)]  
 Sent: Wednesday, June 22, 2016 5:03 PM  
 To: Moore, Geoffrey C CAPT CONAS Whidbey Is, N00  
 Cc: Pam Dill  
 Subject: [Non-DoD Source] FW: this is madness -

Capt. Moore, I appreciated your presence and presentation at today's COG meeting and our conversation yesterday. Below is a common message from one of the Central Whidbey farmers. We spoke yesterday about the difference when pilots are lower and how it intensifies the impact for those beneath the flight path. You said there is a standard range, and I ask if there is any way the pilots can pull up a bit higher in that range as they circle over the workers there, it would be greatly appreciated.

Thanks,

Helen Price Johnson  
 Island County Commissioner, District 1  
 District1@co.island.wa.us <<mailto:District1@co.island.wa.us>>  
 PO Box 5000  
 Coupeville, WA 98239  
 (360)679-7354 office  
 (360)632-1168 mobile  
 "Quality services for a quality life"

From: [REDACTED] Farm & Garden [REDACTED]  
 Sent: Wednesday, June 22, 2016 4:27 PM  
 To: zz district1 <[district1@co.island.wa.us](mailto:district1@co.island.wa.us)>  
 Subject: this is madness -

Dear Helen

This is complete madness. The planes are coming in so low and are so loud. Flew till Midnight last night and are supposed to again tonight and tomorrow. Right now they are just above the barn and trees- barely. You have no idea the effect. We got about 4 hours of sleep last night. Earplugs on in my bed and still too loud. This is NOT okay. My windows are rattling and it is difficult to work. Something must be done. Really different than at OLF as the acceleration and after-burners multiply the effect.

Is the board of health going to do anything? The commisioners? I really wish you and the health commissioners could come hear this first hand. You would get our distress.

I'm sure you are tired of hearing from me but our lives are a living hell. They passed over every 20 seconds last night for over 2 hours. More expected. It has to stop. What can we do?

Sincerely,

[REDACTED]  
 [REDACTED] Farm & Garden [REDACTED]  
 [REDACTED] Coupeville,  
 WA 98239  
 [REDACTED]

## APPENDIX G: COER WANTS TO GET RID OF NASWI

Captain Geoffrey Moore, CO NAS Whidbey Island, "Why would it be in my interest to talk to someone who wants to get rid of me?"

(21 April 2016 Whidbey News-Times, "The man in charge: Moore settles in as base commander")

Captain Moore, you're right. Here's almost if not two pages of *why* so strike back with Scenario A and kick the COER enemy out of ~~Kuwait~~ OLF:

From: [REDACTED]

To: Helen Price Johnson; Jill Johnson; mayor@townofcoupeville.org; justin burnett; Murray, Sheila A CIV NavyRegion NW, N00P; Congressman Rick Larsen [REDACTED]

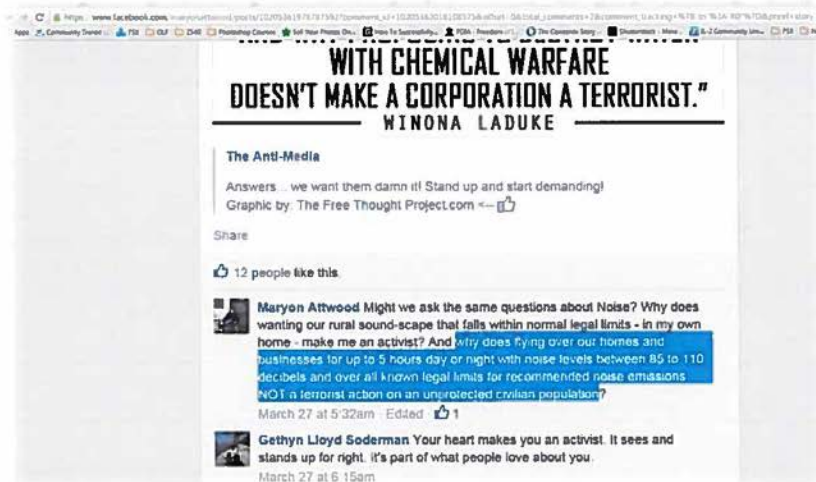
Subject: More thoughts from Slovenia

Date: Wednesday, May 15, 2013 11:30:41 PM

Oh, I forgot about the hundreds of homes and thousands living in APZ1, I.e. Crash zone 1. The collusion of local government with the Feds and military is sinful. Don't make crash zones at OLF, too many people will complain, God, we might lose the oozing of pork grease at NASWI on paydays twice a month, just let people build and try to live in what would have been the crash zones. Way too late for APZs now. And Island County's fraud in taking a fourteen million dollar grant to build the bus barn in what would be APZ1. I'm sure the agency, had they known, would not have granted the money, pork,pork, to build in a crash zone. Maybe they should be notified so they can recover that money back from the County. [REDACTED]

[REDACTED]  
No the military is not being a good neighbor.the military is a guest and this guest is wearing out its welcomeby thier actions.[Reply](#) · [Like](#) · 15 hours ago

[REDACTED]  
· Top Commenter · [Coupeville, Washington](#) The Navy is not even trying despite their rhetoric. They want to train in the darkness so they pick the shortest days of the year in northern latitudes to train. What insensitivity, or are they really that stupid? Train in the winter when it gets dark at 4:30 p.m. and they can do all of their flying at NASWI. They are the biggest bully in the world. [Reply](#) · [Like](#) · [Follow Post](#)



STOP DESTROYING COUPEVILLE. ... we heard the same hollow words during vietnam "that we had to destroy it so we could protect it's freedoms" .. this jewel of the NW geography and historical seaport heritage are being destroyed by the same mindless decision makers. Thousands of my community members have devoted years of environmental good stewardship, celebration and preservation of a unique territorial seaport/ farming community. YOU DESTROY any peace and solitude that my community works hard to achieve. YOU are the ... "HELL FROM THE HEAVENS ABOVE".... YOU poison the environment physically, economically and socially. GO TO LEMORE. ... GO SOMEPLACE WHERE YOU ARE NOT PHYSICALLY THREATENJNG THE CIVILIANS ON THE GROUND. This is an island with limited resources, YOU *have* far exceeded those resources ...  
[REDACTED], Coupeville, WA

It is time for you "representatives" to get some balls and take the death machine on on this issue, quit licking their jackboots! Buck up! You know it is wrong for them ilitary to abuse us with this toxic noise that is ruining our lives and property values, so act in accordance with what you know to be true instead of like worried, timid leaders, afraid of the military, afraid of losing the federal pork it delivers hereon pay days. Get some courage, let the people be heard. Sitting at a table "talking" is not going to solve anything.  
[REDACTED]

APPENDIX H: AVGEEKJOE PRODUCTIONS FACEBOOK AD REQUESTING PRO-OLF COMMENTS

The screenshot shows a Facebook post from 'AvgeekJoe Productions' dated November 18 at 11:12pm. The post text reads: 'Support Naval Outlying Field Coupeville? Then get in a pro-OLF comment to <http://whitbeyels.com/Comment.aspx> please.' Below the text is a photograph of a blue and white EA-18G Growler aircraft on a runway. The post title is 'Environmental Impact Statement for the EA-18G Growler Airfield Operations' with a sub-note: 'All written comments must be postmarked or received (online) by January 25'. A 'Sign Up' button is visible. The engagement statistics are as follows:

6,401 People Reached		
178 Reactions, Comments & Shares		
89 Like	57 On Post	32 On Shares
2 Love	2 On Post	0 On Shares
1 Wow	0 On Post	1 On Shares
45 Comments	41 On Post	4 On Shares
41 Shares	40 On Post	1 On Shares
500 Post Clicks		
0 Photo Views	394 Link Clicks	106 Other Clicks
NEGATIVE FEEDBACK		
2 Hide Post	0 Hide All Posts	
0 Report as Spam	0 Unlike Page	

At the bottom of the screenshot, a Windows taskbar is visible with several open applications including a browser, email, and file explorer.

\*Other Clicks being clicks on the title or the weblink in the post.

Now, US Navy, you are welcome. Now PLEASE use the AFTERBURNERS if you would so kindly PLEASE use the AFTERBURNERS PLEASE.

Sedro Woolley, WA 98284

Uh I forgot to suggest but one thing that I think this EIS needs desperately is several PAGES - not paragraphs, but PAGES - first explaining the history of OLF; secondly how Ebey's National Historical Reserve fits into OLF and OLF fits into National Historical Reserve; and finally how helpful Ebey's National Historical Reserve has been to OLF. OLF is NOT new, period. Let's make Kendall Campbell NECESSARY and show everybody Kendall IS a star player on Team Whidbey, period. Let's push back against those misguided souls who want to pit Ebey's NHR and OLF, period. Oh and Scenario A is NOT new, but restoring OLF to the glory of the 1980s and the standard for VICTORY AGAINST COER. Scenario B is playing for a tie, DAMMIT. Scenario C is total Beyond Stupid, why did I spend a lot of money engaging in an EIS process in taxicabs, printouts and more in the first place?

1.a. Thank You

8.e. Outlying Landing Field Coupeville and Coupeville History

8.f. Cultural Landscape and Impacts to Ebey's Landing National Historical Reserve

## 1.a. Thank You

Sedro-Woolley, WA 98284

The below was turned into the Whidbey News-Times today 14 January 2017:

----- Dear Editor; I got on the horn with Congressman's Larsen office this week and learned the EA-18G EIS extension request was because multiple governmental bodies - such as the Town of Coupeville and the Ebey's NHR Trust Board - wanted more time to blather about EA-18G jet sounds. I hate to be perceived as rude but to be acute a) OLF has been used by jets since 1968 and b) Ebey's NHR came about in the late 1970s and has been a great enabler of OLF flight ops so frankly jets are loud, find a way to coexist. On a personal note, I consider me very good friends with several Growler aircrew. One recent VAQ-129 "Vikings" Fleet Replacement Squadron star graduate in particular has been very sweet to me, but we have yet to arrange me taking a photo of her flying. Now I have a small appreciation of how detachments and deployments away from NAS Whidbey Island affect military families. I'm asking all of us who think OLF and its proximity to NAS Whidbey Island's main base Ault Field matters to please lend our support at [whidbeyeis.com/Comment.aspx](http://whidbeyeis.com/Comment.aspx). This issue of number of bounces at OLF will not be decided by me the afterburner extremist nor the COER, but by those in the middle of those two extremes. Very respectfully; [REDACTED] Skagit County

Sedro Woolley, WA 98284

I wonder if in all the comments you got, if you got any from the City of Anacortes? Or if you realized how much impact Fidalgo Island - a major economy - will get versus a small, shrieking minority that want to boot the US Military out of Central Whidbey? Also if you would, please lay out the historical presence and relevancy of OLF in regards to Ebey's NHR. I mean Ebey's NHR was home to Fort Casey but farming continued anyway.

1.a. Thank You

12.c. Socioeconomic Impacts

2.f. Use of Public Comments

8.e. Outlying Landing Field Coupeville and Coupeville History



- 1.a. Thank You
- 2.h. Next Steps

Sedro Woolley, WA 98284

████ here with another supplemental comment. Since the anti-Growler guys are gonna get emotional now, my turn. Right now, for the first time ever I have a patch with my name on it from a former VAQ-129 student and current VAQ-133 pilot we'll call Lt. █████ (not her real name as this comment will be blasted over the Internets so I picked a pseudonym with a Blue Angels connection). I have to say having this patch and a patch Lt. █████ wore up in the air training to fly the EA-18G Growler makes me feel wonderful, appreciated and included for the work I do behind the camera and to defend OLF - basic human needs after food, shelter and clothing. It meant a lot to me to wear her patches at the Oak Harbor Draft EIS meeting and in a subsequent video interview with an Oak Harbor videographer to make clear this IS personal. To see this mass launch of every single noise complainer - e.g. COER, CCA, Quiet Skies - just go out there and deingenerate the need for Lt. █████ and her colleagues to train to protect we civilians again and again breaks my heart. It's like we need to choose between "quiet skies" and safe skies when in actuality the Navy's been training in Washington State and off the coast of Washington State for decades. You see, I believe in angels (hence the choice of pseudonym). When I hear an EA-18G over my head, I know two angels and, AND their support team of angels too on Terra Firma at Ault Field got my back. More importantly my two parents' back, my transit advisory committees' backs so we can do our jobs and defend OUR Skagit, and I would like to believe the US Constitution's back. I can't hug and thank those angels enough. So yes, my heart is in pieces right now. Lt. █████ didn't get to use OLF - my perception is she gave her OLF FCLP slot up to other students who needed it more and get them some publicity using Runway 14. Then the draft EIS got dropped + the water situation and OLF got shut down - it seems to me on the outside looking in to appease COER so Lt. █████ didn't get her moment. Then the VAQ-129 graduation I was supposed to photograph for Lt. █████ got screwed with due to the VAQ-132 mishap - and probably more. Tragic and crushing. I gotta say as a loving, caring, appreciative man I feel pathetic that while I the autistic spectrum (Asperger's); PTSD-addled civilian feel appreciated I'm terrified MY angel Lt. █████ is gonna be deprioritized to appease the likes of people who will oh yeah they'll crash a base open house... but they won't bring flowers or thank yous to the angels guarding we civilians because they're wanting to protest the very existence of NAS Whidbey Island & ruin the base open house. So I'm going to ask a very personal question: ARE YOU GOING TO GET OUR TROOPS' BACK AND GET SCENARIO A SO OUR TROOPS CAN TRAIN PROPERLY AS YOU CLAIM IN YOUR DRAFT EIS OR ARE YOU GOING TO BE PATHETIC AND PRIORITIZE THE JERKS? THANKS.

- 1.a. Thank You
- 2.h. Next Steps

Sedro-Woolley, WA 98284

The enemy may have got a longer comment period and I was asking, 'What difference does it make?' Well now we know in the midnight hour of 1 February. Try 1,162 and more signatures to support NAS Whidbey Island at <https://www.ipetitions.com/petition/isupportnaswi> That's not the difference the enemy expected. That's what happens when the enemy gets what they request. I've not got a reverse gear so I'm going to keep fighting until such time as I see a VAQ-133 bird, with the beacons on rolling in hot to the OLF pattern and a female voice crackling in my headphones hooked up to my scanner as I aim the camera at my angel lighting the afterburners! OK?

Sedro Woolley, WA 98284

Well since "Coupeville Community Axis" or something like that is priming the pump, MY TURN on 24 Jan 2017. 1) In your fine Draft EIS you say you counted the comments for "General Support". OK, what does "general support" mean? Also are you keeping score by geographic location? Furthermore, considering multiple comments are made about multiple subjects - please explain how will these comments be scored and a few details about defining each category please. 2) What is the economic impact of NAS Whidbey Island upon the Town of Coupeville in dollars, public servants living in the Town, and grants given the Town and Island County Government? One last thing: DON'T GIVE UP THE OLF. SCENARIO A OR DEFEAT.

- 1.a. Thank You
- 12.c. Socioeconomic Impacts
- 12.n. Quality of Life
- 12.p. Local Differences in Economy
- 2.e. Public Involvement Process
- 2.h. Next Steps
- 2.m. Record of Decision/Preferred Alternative

1.a. Thank You

Coupeville , WA 98239

We moved to Whidbey Island 9 years ago with eyes wide open. Our pilots deserve the best available training. This is where they get it. Keep up the great work!

Anacortes, WA 98221

- 1.a. Thank You
- 2.k. Range of Alternatives
- 2.n. Alternatives Considered But Eliminated

The DEIS did not comply with the National Environmental Policy Act (NEPA) by failing to judiciously examine off-Whidbey Island sites to conduct flight carrier land practice (FCLP).

- 1.a. Thank You
- 3.d. Arrivals and Departures

Oak Harbor, WA 98277

Our US military warfighters need the support of the local community so they may continue to train and perfect their skill set to deploy overseas in harms way to protect the very freedoms that the residents of the area of OLF Coupeville may live and enjoy day in and day out. It's disheartening to me that this people who purchase homes in a flight path that has been here long before them, complain of noise. These same people have the very right to move and purchase another home somewhere else that does not have a flight path close to them. They also have the right that these warfighters protect for them to be able to move out of the country if they wish. Be thankful and grateful that someone is going into harms way for your freedoms, and they also have family's to return home to. this is all part of their training that occurs in and around the OLF Coupeville area. Keep it alive!!!